

Rosefield Solar Farm

Applicant's Response to Deadline 4 Submissions

EN010158/APP/8.32
Revision 01
Deadline 5
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Rosefield Energyfarm Limited

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1. Introduction

1.1. Purpose of the Report

- 1.1.1. This document provides, as appropriate, the Applicant's responses to the submissions received at Deadline 4 in respect of the Proposed Development.
- 1.1.2. This document does not look to replicate the positions previously iterated by the Applicant, and so the Applicant instead signposts towards the following documents, where relevant:
- **Response to Section 89 (3) Document [EN010158/APP/8.2] [[AS-035](#)];**
 - **Applicant's Response to Relevant Representations [EN010158/APP/8.3] [[PDA-006](#)];**
 - **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [[REP2-085](#)];**
 - **Applicant's Response to Written Representations [EN010158/APP/8.12] [[REP2-086](#)];**
 - **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [[REP2-087](#)]**
 - **Applicant's Response to Other Deadline 1 Submissions [EN010158/APP/8.14] [[REP2-088](#)];**
 - **Applicant's Response to Other Deadline 2 Submissions [EN010158/APP/8.18] [[REP3-051](#)];**
 - **Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [[REP4-081](#)]; and**
 - **Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [[REP4-082](#)].**
- 1.1.3. Where topics have previously been raised at Issue Specific Hearing 1 (held on 20-21 May 2026) and Issue Specific Hearing 2 (held on 22 May 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:
- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [[REP3-049](#)];**
 - **Applicant's Response to Action Point 12 from ISH1 [EN010158/APP/8.31] [[REP4-089](#)];**
 - **Applicant's Response to Action Point 39 from ISH1 [EN010158/APP/8.27] [[REP4-085](#)];**

- **Applicants Response to Action Point 45 from ISH1** [EN010158/APP/8.26.2];
- **Applicant's Outstanding Responses to Actions from ISH1 and ISH2** [EN010158/APP/8.24] [[REP4-083](#)]; and
- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2)** [EN010158/APP/8.17] [[REP3-050](#)].

1.1.4. Where topics have been raised at Issue Specific Hearing 3 (held on 7-8 July 2026), summaries of oral submissions and the Applicant's responses to the Action Points can be found in:

- **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3)** [EN010158/APP/8.33]
- **Applicants Response to Action Point 18 from ISH3** [EN010158/APP/8.40]; and
- **Response to Action Point 22 and 23 from ISH3** [EN010158/APP/8.41].

1.2. Structure and Approach

1.2.1. This document is structured as follows:

- **Section 2** reviews the submissions made by Interested Parties at Deadline 4 and whether the Applicant is responding to the submissions, or otherwise, and the reason(s) why in either case; and
- **Section 3** provides the Applicant's responses, if applicable, to the submissions made by Interested Parties at Deadline 4.

1.2.2. For the benefit of the Examining Authority (ExA), the Applicant has sought to summarise passages from Deadline 4 submissions where only new matters have been raised by Interested Parties. This exercise has also sought to group submissions by topic and uses the ExA's **Rule 13 Letter** [[PD-017](#)] (dated 16 June 2026) as a general guide.

1.2.3. Where Interested Parties have reiterated previous comments, the Applicant defers to its previous responses contained within the documents referenced in **Section 1.1** of this document.

1.2.4. The Applicant has generally not summarised passages from Deadline 4 submissions where they are being progressed separately through Statements of Common Ground. Where this is the case, the Applicant refers the ExA to the relevant Statement of Common Ground in **Section 2** of this document.

2. Scope of this Report

2.1. Applicant's Position on Providing Responses

- 2.1.1. This Section expands on the structure of this document (as detailed in **Section 1.2**) by confirming whether or not this document provides a response to the submissions made by Interested Parties and, if not, the reason(s) why the Applicant is not responding.

Party and Examination Reference	Responded to in this Document?	Reason
Anglian Water Services Ltd. [REP4-096]	No	The Applicant notes the submission and confirms that there is nothing within the submission which warrants a direct response. Instead, the Applicant is continuing discussions with Anglian Water Services.
Brown & Co LLP [REP4-102]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP4-093]	Yes	The Applicant wishes to note that many of the matters in the updated Principal Areas of Disagreement document submitted by Buckinghamshire Council are already subject to discussion via the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5] . Notwithstanding this, there are limited points which the Applicant wishes to respond to.
Buckinghamshire Council [REP4-090]	Yes	The Applicant wishes to respond to points made in this submission and has done so separately, in detail, through Appendix 1 to this document.
Buckinghamshire Council [REP4-091]	Yes	The Applicant wishes to note that many of Buckinghamshire Council's comments are already subject to discussion via the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5] . Notwithstanding this, there are limited points which the Applicant wishes to respond to.
Buckinghamshire Council [REP4-092]	Yes	The Applicant wishes to note that much of the submission's points are subject to discussion via the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5] . Notwithstanding this, there is one point which the Applicant wishes to respond to.

Buckinghamshire Council [REP4-094]	Yes	The Applicant wishes to note that many of Buckinghamshire Council's comments are already subject to discussion via the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5]. Notwithstanding this, there are limited points which the Applicant wishes to respond to. The Applicant has not responded to, but notes, the appended Solar Energy UK paper (dated June 2026).
Claydons Solar Action Group [REP4-103]	Yes	The Applicant wishes to respond to points made in this submission.
East Claydon Parish Council [REP4-095]	Yes	The Applicant wishes to respond to points made in this submission.
The Environment Agency [REP4-100]	Yes	The Applicant wishes to note that many of the Environment Agency's comments are already subject to discussion via the Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.5]. Notwithstanding this, there are limited points which the Applicant wishes to respond to.
Historic England [REP4-097]	No	The Applicant wishes to note that those matters raised within this submission have been progressed and resolved within the Statement of Common Ground with Historic England [EN010158/APP/5.16.2] [REP2-018].
John Philip Claridge [REP4-105]	Yes	The Applicant wishes to respond to points made in this submission.
National Grid Electricity Transmission Limited [REP4-098]	Yes	The Applicant wishes to respond to points made in this submission.
Natural England [REP4-099]	Yes	The Applicant wishes to note that many of Natural England's comments are already subject to discussion via the Draft Statement of Common Ground with Natural England [EN010158/APP/5.14.2]. Notwithstanding this, there are limited points which the Applicant wishes to respond to.
Preston Farms Ltd and TCS Biosciences Ltd [REP4-104]	Yes	The Applicant wishes to respond to points made in this submission.
UK Health Security Agency [REP4-101]	No	The Applicant notes this submission but does not wish to respond to the points made within it as they do not go beyond the points captured within

the appendices to **Preston Farms Ltd and TCS Biosciences Ltd [REP4-105]**, to which the Applicant is responding within this document.

3. Applicant's Responses

Table 3.1: Applicant's Responses to Deadline 4 Submissions

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
Need, Site Selection and Alternatives			
3.1	Brown & Co LLP [REP4-102] , Page 1	Comment seeking a definitive statement from the Applicant as to why compulsory acquisition of Mr Ives's land is required for the Proposed Development. Further comment seeking confirmation of the land required, the construction specification, and the compensation on offer for Mr Ives's co-operation.	The Applicant has set out the requirements for an Abnormal Indivisible Loads (AIL) access, for which the landowner's land is required, within Works Plans [EN010158/APP/2.3.6] and Environmental Statement (ES) Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.4] [REP4-025] section 3.5.12 onwards. The Abnormal Indivisible Load access corridor parameters are secured in the Design Commitments [EN010158/APP/5.9.7]. As set out in the Land and Rights Negotiation Tracker [EN010158/APP/8.8.4] and in oral evidence at Compulsory Acquisition Hearing 2 as summarised in the Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 2 [EN010158/APP/8.34] the Applicant has sought to reach an agreement with the landowner but to date agreement has not been possible. To ensure the Proposed Development can proceed, and as a last resort if negotiations fail, the Applicant has sought powers of compulsory acquisition over the relevant land. The extent of the land required will be the land required to construct, use and maintain the AIL access. The exact location of the access is yet to be determined but, should the Applicant need to rely on its powers of compulsory acquisition, it would limit any such compulsory acquisition to the minimum land required for the AIL access. Negotiations have been held to try and reach an agreement, with quantum of compensation being the main barrier. If compulsory acquisition powers are implemented then the landowner will be entitled to compensation as assessed by the collection of legislation and case law commonly known as the 'compensation code'. The amount of compensation is not a matter for the present Examination.
3.2	Buckinghamshire Council [REP4-093] , Page 3	Comment noting that a constraints-led alternatives assessment should be undertaken by the Applicant across the full 10km search area. Comment noting that all land parcels, including those beyond the willing landowner's area, should be reassessed against ecological, landscape, heritage, and PRow sensitivities.	The Applicant notes these comments and refers the party to the responses provided under Refs. 3.4.2 and 3.4.3 in Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081].

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
3.3	National Grid Electricity Transmission Limited [REP4-098], Page 1	Comment noting that the party agrees with the Applicant's position regarding the potential constraints of locating the BESS in Fields E10 and E11.	The Applicant welcomes the party's endorsement of the Applicant's position with regard for the potential constraints that make locating BESS in Fields E10 and E11 technically and environmentally unsuitable. It should also be noted that Buckinghamshire Council acknowledge that Fields E10 and E11 are constrained, having regard to the Applicant's further material (see Page 5 of Buckinghamshire Council [REP4-092]).
3.4	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Page 13	Response noting that the party does not accept the Applicant's explanation on why Fields E10 and E11 are not suitable for BESS. They question why, if the Fields are not suitable for BESS for reasons of flood risk, noise and other constraints, why they are acceptable for other larger infrastructure such as the Rosefield Substation. Further comment noting that the only alternatives are the current BESS location or a full compound in Fields E10 and E11, the party suggests that a more suitable location for BESS be considered, or that it be removed altogether given the option of other BESS projects that are already approved.	The Applicant notes this comment but points to Ref. 3.3 above which demonstrates that a key statutory body in National Grid Electricity Transmission Limited agrees with the Applicant's potential constraints reasoning for not locating BESS in Fields E10 and E11. The Applicant also notes that Buckinghamshire Council (see Page 5 of Buckinghamshire Council [REP4-092]) acknowledge that Fields E10 and E11 are constrained, having regard to the Applicant's further material. As for why only the Rosefield Substation can be suitably located in Parcel 3 (Fields E11 and E20, not Field E10 as incorrectly referenced by the party, Field E10 is only proposed to accommodate Solar photovoltaic (PV) development, Interconnecting Cabling Corridor and Secondary Temporary Construction and Decommissioning Compounds, as shown on the Works Plans [EN010158/APP/2.3.6]). The Applicant refers the party to Applicant's Response to Action Point 7 from ISH1 [EN010158/APP/8.19] [REP3-052], sections 3 and 4 of this document provide detailed reasoning as to why both the BESS and Rosefield Substation cannot be located in Parcel 3, where the reasons can be summarised as follows: • Across Fields E10 and E11, there are offsetting requirements from overhead lines and pylons transecting the Fields; • Across Fields E10 and E11, there is a presence of higher flood risk areas; • Field E11's proximity to Sion Hill Farm and associated noise and visual impacts, particularly in combination with noise and visual impacts from Rosefield Substation and National Grid's East Claydon Project.; • The technical (i.e., reduction in transmission losses) and environmental (i.e., temporary disruption associated with construction) benefits in prioritising the Rosefield Substation's proximity to the point of connection. This design decision took account of there not being suitable space to locate both BESS and the Rosefield Substation in Parcel 3 whilst not giving rise to unacceptable environmental impacts and also maintaining sufficient design flexibility to account for the technical unknowns posed by National Grid's East Claydon Project. Ultimately, the party is not wrong to note that environmental constraints (such as flood risk, noise and other constraints) constrain development within Parcel 3. The important distinction as to why the Rosefield Substation can be located within Parcel 3, whilst the

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			BESS cannot, comes back to there not being sufficient physical space and technical or environmental parameters within which both elements can be accommodated here.
3.5	East Claydon Parish Council [REP4-095] , Page 4	Comment noting that the Applicant has stated the installed solar capacity would be 334.1 MW and that the working assumption for the BESS capacity was 1GWh. Comment noting that it would be helpful if the Applicant could explain how this figure was arrived at. Further comment querying what the assumed balance between storage of solar-generated energy and electricity imported from the grid is.	This representation references 'Actual installed capacities for solar and BESS'. The Applicant advises that indicative capacities for solar and BESS have been provided to the examination, but that the 'Actual installed capacities' will only be confirmed at the detailed design stage, i.e. post consent. Indicative solar capacity The Applicant has used industry standard software and its own design experience to prepare an indicative design for the solar element of the Proposed Development. An indicative PV analysis using industry standard software, has been carried out using panel assumptions, site constraints and indicative layout to derive the current estimated solar capacity. Key inputs include the Applicant's proposed layout plans, current or imminently available solar panel technology and technical knowledge of the Site. The design seeks to maximise generation from the Site. The installed capacity will be confirmed at the detailed design stage. This will be dependent on the final layout, technology choices and panels selected. The description of the Proposed Development does not refer to an upper limit on capacity. Imposing such a limit would not be desirable nor necessary. To ensure that benefits arising from the Proposed Development can be maximised at the detailed design stage, iterations of layouts, orientations and evolving technology to be incorporated must be allowed post consent. The Development Consent Order (DCO) includes reference to the means by which the parameters of the Scheme will be constrained and it is on this basis that the Environmental Impact Assessment has been undertaken. There is no reason to limit the generation capacity of the Proposed Development provided those parameters of the consent envelope are adequately captured in the DCO. The Applicant is confident that those parameters are adequately secured in the DCO. Indicative BESS capacity The Applicant has also used industry standard software and its own design experience to prepare an indicative design for the BESS element of the Proposed Development (measured in MWh). Key inputs include the Applicant's proposed plans, current BESS technology and knowledge of the Site. The Applicant explained at Ref. 3.3.1 of Applicant's Response to Deadline 2 Submissions [EN010158/APP/8.18] [REP3-051] that: <i>The candidate BESS design must not exceed the maximum parameters committed to within the DCO through the Design Commitments [EN010158/APP/5.9.5]. The footprint of the BESS Compound will be no greater than 105,000m2 and the height no greater than 6m Above Ground Level (AGL). The BESS units themselves are no greater than 4.5m AGL.</i>

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			<i>BESS designs are evolving and technology is advancing. As they do, energy density (MWh energy storage capacity per BESS Container) is increasing. Further, the Outline BSMP [EN010158/APP/7.9.4] explains that NFCC guidance in place at the time of detailed design, with any amendments (where permitted under the NFCC guidance) required to align with other guidance such as NFPA 855, would be followed for design parameters such as spacing (See Section 5.5) and therefore may also impact the MWh capacity of the Scheme at a future time.</i> <i>For this reason, MWh is not a reasonable control parameter for the design of the BESS component of the Proposed Development.</i> However, the Applicant explained in its Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049] that <i>"the current indicative design for the BESS is approximately 1,000 MWh of storage capacity, equating to around 3 hours of storage at the 335 MW connection capacity."</i> The Applicant confirms that the indicative 1,000MWh of storage capacity represents a reasonable assumption of the energy storage capacity which may be accommodated within the maximum parameters committed to within the DCO through the Design Commitments [EN010158/APP/5.9.7]. Appendix 1 of Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] also explains that: • The power capacity of the BESS matches the grid export capacity available to it; • Based on the indicative layout of the solar array and the BESS design parameters, the energy generated by the solar array over the course of a day can regularly exceed the energy storage capacity of the BESS. Assumed balance between solar and grid imports The Applicant responded to the second point raised in its answer to ExQ1.6.2 BESS Capacity as part of Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087], in which the Applicant stated that <i>"how the BESS would operate at any one time would depend on many uncontrollable factors, including: national demand, the weather, and the technology composition of the UK energy market."</i> By extension this means that any assumption-based assessment of balance between storage of solar-generated energy and electricity imported from the grid would be heavily caveated, highly uncertain and would not benefit the Examination. The Applicant's ExQ1.6.2 response went on to state that <i>"There is therefore no reason to limit the operability of the Proposed Development or any component of it provided that operating the Proposed Development does not impact any parameters of the consent envelope which are captured in the DCO"</i>.
3.6	Claydons Solar Action Group [REP4-103], Pages 3 and 4	Comment noting that the Applicant has not adequately justified why Fields E10, E11 and E20 are unsuitable for	The Applicant refers the party to Refs. 3.3 and 3.4 above, including clarification that Field E10 is only proposed to accommodate Solar PV development, Interconnecting Cabling

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		the BESS yet remain appropriate for the Rosefield Substation and Main Collector Compound.	Corridor and Secondary Temporary Construction and Decommissioning Compounds, as shown on the Works Plans [EN010158/APP/2.3.6]. With regard for the Main Collector Compound, and as noted in section 3.8 of ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.4] [REP4-025], it would serve to: manage the underground Interconnecting Cabling Corridor(s) from across the Site; connect all the underground cabling from the Independent Outdoor Equipment and/or ITS and the two Satellite Collector Compounds; receive underground cables which connect to the BESS and connect to the Rosefield Substation to facilitate the export and import of electricity to/from Grid. Therefore, from a technical design and environmental perspective, it is important that the Main Collector Compound is located close to or is co-located with the Rosefield Substation. With the maximum envelope of the Main Collector Compound being 25,000m², the technical and environmental parameters are sufficient to locate the Main Collector Compound together with the Rosefield Substation in Parcel 3.
3.7	Claydons Solar Action Group [REP4-103], Pages 17 and 18	Comment noting that, based on the Applicant's assumed annual increase in panel efficiency points made during ISH1 and likely grid connection dates (2031–2035), the Proposed Development could result in substantial overplanting even from the earliest connection date. Comment noting that this suggests capacity would exceed assessed assumptions at design stage, thus undermining the Applicant's justification for retaining all fields on capacity grounds. Further comment noting that the Proposed Development would still be overplanted were the most contentious fields (being Fields B6, B7, B8, E23, D28 and D29) removed, noting they contribute some 55 MW or 17% of the current assessed 335 MW capacity.	Assuming no changes to the indicative design, ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2.2] [APP-051] provides that the nameplate capacity of the Proposed Development at the time of DCO Application is 334.1MW. • When assessed against a 500MW grid connection, it is clear that the Proposed Development is not overplanted. • When assessed against the revised 335MW grid connection, the overplanting ratio would be much closer to 1, but still less than 1, therefore also not overplanted. (334.1/335=0.997). However, the Applicant may at the detailed design stage design a scheme which is overplanted based on the expected grid connection capacity of 335MW (AC) and respects the design parameters in the DCO Application, as set out within the Design Commitments [EN010158/APP/5.9.7]. Overplanting of the Proposed Development is therefore possible but not guaranteed. In relation to the two worked examples provided in this representation quantifying the potential installed capacity of the Proposed Development as built in 2031 and 2035, the Applicant makes the following observations: • The installed capacity of the Proposed Development has been provided on an indicative basis, using assumptions made at a point in time; • Overplanting, if delivered at a scheme, is beneficial to achieving the Government's aims and meeting the urgent need for new low carbon generation, and is supported by Government; • The level of capacity deliverable at the Proposed Development will be confirmed at the detailed design stage; • The installed design must not exceed the maximum parameters committed to within the DCO through the Design Commitments [EN010158/APP/5.9.7]. This would include any overplanting if deliverable;

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			• The levels of overplanting calculated in this representation (23% to 45%), if achievable at the Proposed Development while still respecting the Design Commitments, are commercially and operationally rational; and • Overplanting to this level would increase utilisation of the grid connection secured for the Proposed Development and the benefits deriving that use. The Applicant therefore confirms that removing fields from the Proposed Development, or leaving fields free of development where instead solar PV modules are proposed, would limit the nameplate capacity deliverable at the Proposed Development, versus any assessment of nameplate capacity made without any removals or restrictions. Removing or restricting fields from development would reduce the benefits deriving from the Proposed Development and reduce utilisation of the grid connection. Such an approach would be adopting a “wait and see” approach to panel efficiency which is not aligned with the urgent need for renewable energy. It is also unjustified, noting that overplanting is permissible and can be useful to deliver decarbonisation objectives and maximise use of available grid connection capacity. The Statement of Need [EN010158/APP/5.6] [APP-036] explains that an unprecedented capacity of new low-carbon schemes is urgently needed to support the Government’s energy objectives for decarbonisation, security of supply and affordability. With this as a context, the Statement of Need [EN010158/APP/5.6] [APP-036] explains that the Proposed Development has been proposed at a scale which will make a significant contribution towards meeting the Government’s objectives. The Statement of Need [EN010158/APP/5.6] [APP-036] explains that the location of the Proposed Development enables it to deliver against the urgency of need, in relation to decarbonisation, security of supply, and affordability and, in further support for the proposed scale of the Scheme, explains why the Applicant seeks to maximise use of the connection capacity which is to be made available to it. Section 7.6 of the Statement of Need [EN010158/APP/5.6] [APP-036] explains that while overplanting is not a requirement of a scheme (derived from National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2023) paragraph 2.10.55, which states that: “<i>Applicants may account for this [degradation] by overplanting solar panel arrays</i>”), overplanting provides an opportunity to increase the quantity of valuable low carbon, zero-marginal cost MWh of electricity transmitted from a solar scheme to the grid over its lifetime. Government policy is therefore supportive of overplanted schemes because of the additional benefits they can bring to meeting its energy objectives. NPS EN-3 (2023) describes that overplanting refers to the situation in which the nameplate capacity of the facility is larger than the generator’s grid connection (Footnote 98 to Paragraph 2.10.55). The Grid Connection Statement [EN010158/APP/7.1] [APP-137] explains that the Applicant has requested a reduction to the grid connection capacity, seeking to decrease the import from 500MW (AC) to 335MW (AC) and the export from 500MW (AC) to 335MW

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			(AC). The Applicant expects that in Q1 2027 or earlier, the Applicant will receive its Gate 2 grid connection which will reflect the revised export capacity of 335MW (AC). However, the reduced connection capacity cannot be assumed until a revised offer is issued by NESO and accepted by the Applicant (although the Applicant has not identified any reasons why the revised offer might not be forthcoming). The Planning Statement [EN010158/APP/5.7.5] [REP4-008] concludes, through Sections 9 and 10, that the combined nature of the benefits of the Proposed Development, which includes the needs case in meeting the established and urgent need for renewable energy for low carbon electricity infrastructure, for which substantial weight is to be afforded, outweigh any residual effects and that the planning balance is firmly in favour of approval.
3.8	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Page 22	Comment setting out that the party does not consider that the capacity benefit of including Field E23 outweighs the potential adverse effects. Further comment maintaining that policy support for renewable energy does not negate the mitigation hierarchy and that the Applicant must avoid and reduce adverse effects where it can.	The Applicant notes these comments but disagrees with the assertion that the mitigation hierarchy has not been adhered to. The Applicant refers the party to the response provided for under Ref. 3.15.2 and Ref. 3.15.5 in Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081]. In particular, the Applicant reiterates that Field E23 is capable of providing approximately 15MW of renewable energy generation and is therefore an important part of the Proposed Development to meet the policy objectives of maximising the energy generation near the point of connection, making efficient use of the land and meeting the urgent need for renewable energy as CNP infrastructure, in line with Overarching National Policy Statement for Energy (NPS EN-1). Notwithstanding, and as confirmed through Ref. 3.15.5 in Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081], the Construction Compound has been removed from Field E23 and several new documents considering Field E23 were submitted at Deadline 4 (including the Draft Animal Movement Arc Plan at Appendix 1 to Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22] [REP4-081], Preliminary Biosecurity Statement [EN010158/APP/8.28] [REP4-086] and Construction Access Review [EN010158/APP/8.29] [REP4-087]). Regard should also be had to paragraph 4.2.24 of NPS EN-1, which states that “<i>measures that result in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function” (our emphasis). The Applicant does not consider the removal of approximately 15MW to be insignificant or to result in a significant benefit that warrants its removal; the latter point is only applicable in cases where there would be a small reduction in function which, in this case, is not true.</i>
Biodiversity and Ecology			
3.9	Buckinghamshire Council [REP4-093], Page 5 and	Comment noting that the Applicant should identify and secure sufficient compensation land and land	As detailed in ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.6] and secured via the Outline Construction Environmental Management Plan (Outline CEMP)

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
	Buckinghamshire Council [REP4-094] , Pages 7 and 8	management actions to compensate for the displacement of 39 breeding pairs of skylark.	[EN010158/APP/7.2.6] and Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.6] the Applicant is proposing approximately 95ha of grassland creation as alternate grassland habitat for ground nesting birds as mitigation, the creation and enhancement of grassland under Solar PV modules, the enhancement of field margins and provision of winter bird seed and considers this proportionate mitigation to offset potential impacts. The Applicant also refers to comments provided by Buckinghamshire Council within Buckinghamshire Council (Responses to comments on local impact reports (LIRs)) [REP3-055] Page 15, Ref 3.10 noting agreement on the approach taken to the assessment and mitigation of ground nesting birds following updates that were undertaken by the Applicant to the Outline LEMP and Outline CEMP. The Applicant has also revisited the mitigation proposals for ground nesting birds providing a full justification regarding its position for ground nesting bird mitigation, including evidence for the existing population of skylark located within the proposed mitigation areas, at Deadline 5, please refer to the Position Paper on Ground Nesting Birds and Wintering Birds [EN010158/APP/8.36] for further details.
3.10	Buckinghamshire Council [REP4-093] , Page 5 and Buckinghamshire Council [REP4-091] , Page 2	Comment noting that a clear cross-referenced schedule or plan should link retained arboricultural features, buffer zones, proposed works, and corresponding arboricultural method statement and outline CEMP protection measures.	A detailed plan which would include the retained arboricultural features, exact location of the proposed works and buffer zones will be developed during the detailed design in consultation with Buckinghamshire Council as secured in the Outline CEMP [EN010158/APP/7.2.6] .
3.11	Buckinghamshire Council [REP4-093] , Page 6	Comment noting that the Proposed Development should relocate all attenuation ponds, surface-water features, trenches and excavations currently shown within or immediately adjacent to woodland buffers.	Design Commitment [EN010158/APP/5.9.7] C7 secures that principal components of the Proposed Development will avoid root protection areas of trees and hedgerows as far as reasonably practicable. The Applicant would therefore seek to locate attenuation ponds, surface water features, trenches and excavations outside of the root protection areas and woodland buffers as far as reasonably practicable at detailed design. If the Root Protection Areas cannot be avoided, mitigation measures would be in place, as set out and secured in Table 3.2 (Page 47) of the Outline CEMP [EN010158/APP/7.2.6] that was updated at Deadline 4 in consultation with Buckinghamshire Council. The Applicant has had further engagement with Buckinghamshire Council in relation to these measures and has made minor amendments detailed in Table 3.2 in the Outline CEMP [EN010158/APP/7.2.6] submitted at Deadline 5.
3.12	Natural England [REP4-099] , Page 2	Comment noting that, as part of a freedom of information request, the proposed SSSI boundary for the Bernwood designation has been attached with this submission.	The Applicant notes this has been submitted. The Applicant has already provided responses regarding the proposed Bernwood SSSI designation and its assessment of effects (see 2.1.47, 2.1.48 pages 50 and 51 of the Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]). As detailed within ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.6] limited information on the proposed Bernwood SSSI designation is publicly available and the date for designation is not yet known. Therefore, the proposed Bernwood SSSI has not been specifically assessed as a receptor in its own right however, Sheephouse Wood SSSI, Finemere Wood SSSI, Grendon and Doddershall Woods SSSI, ancient woodland and Bechstein's bats (all of

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			which would fall under the proposed Bernwood SSSI designation) have all been fully assessed. Notwithstanding this, any potential impacts on the proposed features to be included within the proposed Bernwood SSSI are considered capable of being effectively mitigated through the implementation of the measures secured in the Outline LEMP [EN010158/APP/7.6.6] . This approach has been discussed and agreed with Natural England, see Draft Statement of Common Ground with Natural England [EN010158/APP/5.14.2] for further details.
3.13	Natural England [REP4-099] , Page 3	Comment noting that a distinction is drawn between land qualifying for SSSI designation and wider supporting habitat, with impacts on Bechstein's bats assessed irrespective of proposed designation boundaries. Comment noting that pastureland within B fields and C and D fields remain functionally important as part of the core sustenance zone. Further comment noting that the party has, elsewhere, provided great detail as to why the Proposed Development has the potential to cause harm to the population of Bechstein's bats.	The proposals previously provided a net increase in grassland (twice as much created/retained as lost) across the core sustenance zone for foraging Bechstein's bats, distributed with regard to the closest breeding colony in Finemere Wood. The Applicant's view was therefore that the impacts of the Proposed Development were adequately mitigated, with mitigation located to reflect the needs of breeding bats at their most energetically-sensitive time (see Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]). Notwithstanding this, in response to Natural England's request for additional grassland to support the future resilience of the Bechstein's bat population, Solar PV modules have been removed from the entirety of Field B6 and Field B8, western and southern parts of Field B7. Offsets from Sheephouse Wood and Shrubs Wood have also be increased to 50m. This has been updated in the Works Plans [EN010158/APP/2.3.6] and Outline LEMP [EN010158/APP/7.6.6] at Deadline 5. The Applicant has reached agreement on this matter with Natural England which is detailed in the updated Draft Statement of Common Ground with Natural England [EN010158/APP/5.14.2] submitted at Deadline 5.
3.14	Claydons Solar Action Group [REP4-103] , Page 4	Comment noting that the party believe the BNG assessment should be as accurate as possible and query whether the Applicant's commitment to a 40% net gain will require offsite provision or onsite provision, as well as the likelihood of that provision being met locally.	The Applicant submitted an updated ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.4] at Deadline 4, taking into account comments raised by Claydons Solar Action Group (CSAG) and Buckinghamshire Council. The Applicant is confident that the BNG assessment undertaken is accurate and provides a true reflection of the baseline habitats and conditions currently present within the Order Limits and that the habitat creation and enhancement proposals are pragmatic and deliverable on the ground and will provide sufficient habitats to support a range of species. The Applicant has provided a full justification regarding their position for mapping of arable field margins at Deadline 5, please refer to Position Paper on Arable Field Margins and BNG Assessment [EN010158/APP/8.37] for further details. Notwithstanding this, for clarity and to address the comments made by CSAG, the Applicant has updated ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.4] at Deadline 5 to map arable field margins within the baseline to all arable fields even where these fall below the minimal mappable unit. In doing so, the post-development value for area habitat units has resulted a decrease from 3123.83 area habitat units at Deadline 4 to 3076.73 area habitat units at Deadline 5. This equates to an overall net gain of 46.63% area habitat units at Deadline 5 (a 2.88%

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			difference from the BNG assessment submitted at Deadline 4, where a 49.51% net change in area habitat units was reported). As can be seen this makes no significant material difference to the overall BNG assessment, neither underestimating baseline biodiversity value or inflating post construction values, and has demonstrated that the Applicant is still able to fulfil its commitment to delivering a minimum of 40% area habitat units as part of the Proposed Development. The Applicant intends to deliver all BNG on-site within the Order Limits and will not be seeking to deliver any of the net gain requirements off-site, negating the need to compensate further away from where potential impacts would occur and ensuring that mitigation and enhancement measures are delivered locally.
3.15	Claydons Solar Action Group [REP4-103] , Page 5	Comment noting that, in relation to measuring buffers from hedgerows, it would be straightforward to measure the extant outer canopy line of existing hedgerow vegetation at a fixed and agreed point in time, using satellite imagery.	The Applicant acknowledges the comment raised by CSAG but maintains its current position that hedgerow buffers will continue to be measured from the centreline of hedgerows. Measurements for hedgerow buffers are taken from hedgerow centrelines, with the measurement being offset either side from centre line of hedgerows within the Order Limits (see Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006], Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085], Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086], Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087]). This is the most consistent and accurate way to measure buffers (as well as being realistic/achievable on-site), the above approach has been deemed sufficient for the consented Byers Gill and Springwell NSIP solar DCOs.
3.16	Claydons Solar Action Group [REP4-103] , Pages 6 to 8	Comment noting that the party disputes the Applicant's justification at oral hearings for omitting habitats in the BNG assessment based on minimum mapping thresholds and application of the degradation rules, asserting that these omissions underestimate baseline ecological value and inflate post-development gains.	Please refer to the response provided at Ref. 3.14 .
Draft DCO			
3.17	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104] , Page 12	Comment confirming that the party has considered Article 23(2) of the Draft DCO and that they have no further questions on its drafting.	Noted.

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3.18	The Environment Agency [REP4-100] , Pages 3 and 4	Comment noting that the word 'substantially' needs to be removed from the requirements of the Draft DCO where the Environment Agency is listed as a consultee.	The Applicant maintains that the wording that final plans must be “substantially in accordance with” the outline plans is standard and accepted drafting across made DCOs. The wording is necessary because it allows appropriate flexibility to respond to issues arising from detailed design or any other new relevant circumstances whilst still preserving the ability of the relevant planning authority to refuse to approve any scheme it considers inappropriate or inadequate (whether or not it is substantially in accordance with the outline scheme). The wording strikes the necessary balance between securing the measures in the outline management plans which provides sufficient comfort to all stakeholders on their delivery/implementation, while also preserving the necessary flexibility should circumstances change come detailed design, where, for example, the measures are no longer considered appropriate or most effective. Schedule 16 (Procedure for Discharge of Requirements) of the Draft DCO [EN010158/APP/3.1.8] provides further checks and balances, and the EA should be reassured by the robust wording this schedule. The procedures for discharge provide a “lock” on the developer departing too far from what is in the outline plans in any material sense, because the developer needs to confirm, when submitting the final detailed plan for approval, that it does not result in materially new or materially different environment effects compared to those assessed in the ES (and if it does, the developer must provide information in a statement setting out what those effects are). Further, the Applicant notes that the EA as a ‘requirement consultee’ will have the opportunity to request further information it considers necessary to comment on the final plan submitted by the undertaker for approval – and the undertaker must provide this further information as required (Schedule 16 paragraph 3 of the Draft DCO [EN010158/APP/3.1.8]). In its capacity as a consultee, the EA will have an opportunity to engage with Buckinghamshire Council on the detailed plans and raise any concerns where it does not consider the plans are ‘in accordance’ with the outline plans (and why), and Buckinghamshire Council will be able to take this on board when considering whether to approve the plan. Ultimately it is within the control of Buckinghamshire Council – having consulted with the EA, any other required consultee and anyone else it considers necessary – not to approve any of the final detailed plans/strategies if they do not consider the necessary measures are appropriately secured, especially where the failure to do so could result in worse effects.
Cumulative Effects			
3.19	Buckinghamshire Council [REP4-094] , Page 15	Comment noting that the current approach to cumulative assessment risks understating the magnitude and weight of landscape, visual and cumulative effects by classifying them as temporary despite their long-term, operational presence.	The Applicant acknowledges that effects persisting for the full operational period should be treated as long-term and reflected accordingly within both the significance assessment and the cumulative effects assessment. However, the Applicant considers it appropriate to describe such effects as temporary in planning terms given that the Proposed Development

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		Comment noting that the party considers effects persisting for the full operational period should be treated as long-term and reflected accordingly in both the significance assessment and cumulative appraisal. Further comment noting that this would address the party's concern.	would operate for a finite period of up to 40 years, as secured through the Draft DCO [EN010158/APP/3.1.8], after which it would be decommissioned and the land restored. The Proposed Development is not permanent development. At the end of the operational period, all Solar PV infrastructure, the Rosefield Substation, the Battery Energy Storage System (BESS) and associated infrastructure would be removed. Hardstanding areas would also be removed, and the land restored in accordance with the measures set out in the Outline Soil Management Plan (Outline SMP) [EN010158/APP/7.7.4], including the reinstatement of soils to a condition comparable to that recorded in the pre-construction Agricultural Land Classification (ALC) surveys. The ES clearly identifies effects that would persist throughout the operational lifetime of the Proposed Development and assesses these accordingly. The Applicant does not consider that the description of the development as temporary has resulted in an understatement of likely significant landscape, visual or cumulative effects.
3.20	Buckinghamshire Council [REP4-094], Page 16	Comment noting that the party's concerns regarding the cumulative effects assessment methodology remain due to the absence of a numerical breakdown of land use impacts, including hectare figures within Table 12.12. Comment noting that insufficient assessments have been undertaken on direct and cumulative ALC land loss, particularly given site-specific impacts and specialised agricultural uses.	Table 12.4, which was added to ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.4] at Deadline 3, and reformatted at Deadline 4, includes a breakdown of land use of key infrastructure by hectareage of the Proposed Development. The Applicant proposes that this is a more suitable location than Table 12.12, which shows a summary of effects for each receptor assessed. Table 12.3 also presents a breakdown of ALC Grades within the Order Limits. Given that ALC is concerned with the physical limitations of the land, the Applicant maintains that specialised land use such as the production of blood products for the NHS is not relevant to the assessment. Agricultural outputs, including crop rotations and yields, will be discussed in the Food Security Explanatory Note [EN010158/APP/8.35] submitted at Deadline 5. The Applicant has updated ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4] at Deadline 5 to include a cumulative effects assessment on BMV land. A focus on BMV land use in this assessment is in line with NPS EN-1 and NPS EN-3, both of which emphasise the use of non-BMV land and the avoidance of BMV land where possible.
Health and Wellbeing			
3.21	Buckinghamshire Council [REP4-091], Page 2 and Buckinghamshire Council [REP4-094], Pages 21 to 24	Comment noting that the party was unable to identify updates within [REP1-057] addressing the SIA guidance and requests clearer signposting to where this has been assessed, including relevant health determinants. Comment noting that review of the subsequent rev 4 submission [REP3-026] has not identified any further edits addressing this matter.	The Applicant notes that the ISEP (formerly IEMA) 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 so at that point wasn't directly referenced in the application documents. The Applicant has since reviewed this guidance, and is content that the approach taken is compliant, but more importantly is in accordance with the requirements of legislation (the EIA Regulations), policy (NPS EN-1) and the approach agreed through the scoping

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		Further comment noting that clarification is sought on which potentially significant environmental effects have not been mitigated where not practicable, and whether any such effects remain.	process. As such, no amendments to the methodology were made to the document at subsequent re-submissions during the examination phase. For the avoidance of doubt, the guidance referred to by Buckinghamshire Council does not set or identify determinants of health to be considered in a Health Impact Assessment or when assessment population, health and wellbeing effects within an EIA. Instead, at Page 8 of that guidance, the guidance states that: <i>“The ISEP (formerly IEMA) HIA guidance should be used when a separate human health chapter is required for an EIA:</i> - <i>Effective Scoping of Human Health in Environmental Impact Assessment (2022)</i> - <i>Determining Significance for Human Health in Environmental Impact Assessment (2022)</i> The referenced guidance has been used as the basis for identifying relevant determinants of health for the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7] – latest version to be re-submitted at Deadline 5 - as is explained throughout the document. Buckinghamshire Council may be conflating the ‘Wider Determinants of Health’ (used in health impact assessments and defined and referenced within the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7], with the determinants of social wellbeing referred to by the ISEP Social Impact Assessment guidance in the context of the ‘Sustainable Wellbeing Framework’ which it recommends is used to define outcomes in Social Impact Assessments (noting that guidance suggests the criteria within the framework is adapted to the specific project and the type of impacts being assessed). This wellbeing framework is derived from a National Wellbeing Framework, which is used in an overarching sense to determine policy as well as assess development (of all kinds). Notwithstanding this, the Applicant is content that where there is a clear health pathway – both physical and mental – that criteria within the Sustainable Wellbeing Framework have been applied through the application of Wider Determinants of Health. To clarify the Applicant’s position regarding the comment <i>‘clarification is sought on which potentially significant environmental effects have not been mitigated where not practicable, and whether any such effects remain’</i> – no significant effects remain that it has not been practicable to mitigate. The only potentially significant environmental effects reported in the EIA which remain after embedded and additional mitigation have been applied are in relation to landscape and visual matters.
3.22	Buckinghamshire Council [REP4-091], Page 3	Comment noting that the significant residual human health effects identified in Table 7 of [REP3-026] should be clearly summarised and included in the non-technical summary.	Following a discussion at Issue Specific Hearing 3, the Applicant has taken an action to update the Non-Technical Summary [EN010158/APP/6.4.2] to include health and wellbeing, including clearly summarising the significant residual effects. This has been submitted at Deadline 5.

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3.23	Buckinghamshire Council [REP4-091] , Page 4	Comment noting that further clarification should be incorporated into the documentation to set out the intended evolution of mitigation, including receptor- and location-specific measures and monitoring or remedial actions. Comment noting that these commitments should be strengthened through the inclusion of appropriate wording within the REAC.	The Applicant's position is that the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7], and particularly Annex A (Health Effects Report), already provides a clear narrative of the evolution of mitigation, including receptor- and location-specific measures where necessary and relevant, and a description of monitoring or remedial actions. This was further enhanced by additional information added at Deadline 4, and as such, it is not considered necessary to add any further narrative or detail, or undertake any further impact assessment, to demonstrate clear compliance with legislation, policy or guidance or clearly articulate the approach to bespoke or flexible mitigation to address significant effects where practicable.
3.24	East Claydon Parish Council [REP4-095] , Page 3	Comment noting the importance of the PRoW network to local communities as their principal amenity and source of health and well-being. Comment welcoming the Applicant to walk the network, noting along its entirety the true impact of the resulting industrialisation of the open countryside.	The Applicant is acutely aware of the importance of the PRoW network in policy terms, and as a resource for social networks, community access, and recreation that is intrinsic to the wider determinants of health (access to the natural environment for active recreation, and changes in landscape and visual amenity). Sections 7.3 and 7.4 of the Health Effects Report (Annex A to ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.7]) provide a description of these health pathways, an overview of changes to the PRoW network and the experience of it (drawing together in-combination effects, as well as community connectivity), and highlight the mitigation and enhancement provided by the Applicant to address these. Many of the Applicant's team have walked the PRoW both through and around the Site on many occasions, including during the Accompanied Site Inspection with the ExA, and in-line with principles for undertaking assessment of effects on users of PRoW.
Landscape and Visual (including Good Design)			
3.25	Claydons Solar Action Group [REP4-103] , Pages 14 and 15	Comment noting that the Applicant's assessment of non-visual effects is too narrow, omitting relevant physical factors such as vibration, dust, drainage and pollution. Comment noting that it also fails to consider important intangible impacts, including tranquillity, sense of safety, and personal experience of the landscape.	It is noted that no significant adverse effects have been assessed in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.4] or ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4.2], whilst the assessment of air quality (including dust and odour) was scoped out of the EIA from the outset of the Proposed Development. It is therefore considered that any non-significant effects associated with these factors would not add further to the judgement of sensitivity or magnitude of effect. Potential effects over and above the long-term physical changes and additions experienced over the operational life of the Proposed Development would occur solely during the construction stage in certain instances. These are detailed at para. 10.10.160 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.4] as the temporary Construction Compounds (with associated temporary night time lighting) and access tracks, the movement of vehicles and delivery of components to Site and the movement of plant and personnel within the Site installing the Proposed Development. These are all tangible factors that would have a potential effect on tranquillity and experience of the

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			landscape and views (intangible experience). The Applicant therefore maintains that such 'sensory impacts' have been considered in both the assessment and mitigation of effects. These effects would not be experienced on cessation of construction activity. Where mitigation planting would potentially screen or partially screen views of the Proposed Development, judgements have also taken into consideration the perceptual experience of receptors, in terms of the loss of views as a result of screening. This accounts for the relatively small reduction in the residual scale of change experienced by certain footpath users, even where views of Solar PV development could be largely screened, such as along Splash Lane bridleway between Botolph Claydon and Runts Wood. Hence the tangible loss of such experiences has been incorporated into the LVIA judgements.
3.26	Claydons Solar Action Group [REP4-103] , Page 16	Comment noting that in a meeting between the party and the Applicant, the Applicant had stated but on review not included consideration for disruption to field patterns and loss of views arising from screen planting.	The Applicant does not agree that changes to field pattern are excluded from assessment. As presented in the Design Approach Document [EN010158/APP/5.8.3] [CR1-014] the removal of hedgerow would be minimised and would predominantly consist of breaks in hedgerows to accommodate new access tracks and cable routes. This would enable the majority of existing hedgerows and hedgerow trees to remain undisturbed and hence likewise the existing landscape field pattern. Where longer sections of hedgerow would require removal, such as within Parcel 3 as a result of the introduction of the Rosefield Substation, this has been taken into account in the assessment of effects upon landscape receptors. The Applicant does not agree that the loss of views arising from screen planting has not been accounted for. ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.4] clearly explains the changes in extent of views for each receptor group through the lifetime of the Proposed Development. It should be noted that a loss of wider views, as in the instance of views to the Aylesbury Vale from the lower levels of Splash Lane, would also result from the introduction of solar PV in the first instance. Hence hedgerow planting would not further increase the extent of screening of wider views. This would be the case in all instances where public access would result in close proximity views of the Proposed Development, i.e. where PRoW are located either within or to the immediate boundary of solar PV and where hedgerow planting is used to mitigate these views. Hence the assessment of residual effects following the establishment of mitigation planting has already taken into account the loss of views as a result of the solar PV development as part of the overall judgement of effects at Year 1. Whilst this loss of views would continue to be experienced following the establishment of mitigation planting, it is the view of the Applicant that the screening of solar PV development itself warrants some reduction in magnitude of effect. In the instance of views from Splash Lane it has been judged that the residual effect would reduce from Major to Major/Moderate adverse. The example given by CSAG at point 12 of REP4-103 includes views from Bridleway ECL/5/1 to within Field E23. Viewpoints 21a, 22b and 27 in ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] provide an indication of the varied experience of views that would be experienced by users of this route. Whilst it is acknowledged that there would be a potential increase in screened views whilst within Field E23, this makes up only a small proportion of the overall experience of users of this

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			bridleway. The Applicant therefore disagrees that this relatively small loss of views to within Field E23 would negate any reduction in effect of the wider experience of users of this bridleway following the establishment of mitigation proposals.
Noise and Vibration			
3.27	Buckinghamshire Council [REP4-094], Page 29 and East Claydon Parish Council [REP4-095], Page 6	Comment noting that concern relates to potential adverse noise effects at low background receptors, where even sub-threshold levels may be perceptible due to relative change, in line with established assessment principles. Comment noting that the outline OEMP currently lacks sufficient certainty to address these impacts, and should include clearer commitments, site-specific assessments, and robust verification and enforcement mechanisms.	The operational phase noise levels have been assessed in accordance with British Standard 4142 'Methods for rating and assessing industrial and commercial sound'. The prescribed methodology requires the noise levels generated by the Proposed Development to be assessed against the measured pre-development background sound level at the surrounding receptor locations. Taking into account the context in which sound occurs is an important part of a BS 4142 assessment. One factor stated is that the absolute level of sound can be as, or more, important than relative outcomes where background and rating levels are low. This reflects the baseline environment at noise-sensitive receptors surrounding the Proposed Development. BS 4142 does not define 'low' in the context of background sound levels nor rating levels. However, the Association of Noise Consultants suggest that background levels of less than about 30 dB LA90 and rating levels of less than about 35 dB LAr would be a reasonable indication. The background level stated reflects the conditions observed and measured in the baseline environment within the Study Area, particularly at night. On this basis, an external rating level of 35 dB(A), inclusive of penalties for characteristics such as hums, has been adopted as the lowest observed adverse effect level for the night-time period. Not exceeding this threshold constitutes a situation whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. 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. This approach aligns with many other consented NSIPs that have applied a similar approach due to low background sound levels, as set out in the Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082]. Notwithstanding this, the assessment methodology adopts a precautionary approach in regards to the prediction of noise levels from the Proposed Development. The prediction of noise is based on the assumption that all noise generating items of plant throughout the Site will operate 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, due to darkness and temperature fluctuations resulting in lower cooling demands. The assessment also assumes that all sources will propagate downwind to a given receptor, regardless of the relative location; this is likely to result in a further overestimation to the predicted noise level at receptors. The relative differences between the background sound levels and predicted rating levels are therefore likely to be lower in practice than

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			those presented in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.4]. The operational noise levels are secured by a Requirement in Schedule 2 of the Draft DCO [EN010158/APP/3.1.8]. The mitigation measures required to achieve the operational phase noise criteria will be subject to the detailed design stage of the Proposed Development, however, the proposed mitigation strategy and the noise monitoring that would be undertaken to demonstrate compliance are set in the Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.6]. These are considered to be suitably robust.
3.28	Claydons Solar Action Group [REP4-103], Pages 3 and 4	Comment noting that it has not been explained by the Applicant why noise and cumulative impacts are a constraint for BESS in Fields E10, E11 and E20 but are not a similar constraint to the location of the Rosefield Substation.	The Applicant refers the party to Refs. 3.3 and 3.4 above, including clarification that Field E10 is only proposed to accommodate Solar PV development, Interconnecting Cabling Corridor and Secondary Temporary Construction and Decommissioning Compounds, as shown on the Works Plans [EN010158/APP/2.3.6]. Within Parcel 3, the noise assessment has accounted for the Rosefield Substation, Main Collector Compound and Inverters. The noise levels generated by the Rosefield Solar Farm has been assessed in combination with the cumulative (inter-project) noise levels generated by the East Claydon BESS and National Grid East Claydon Substation extension. When accounting for the cumulative (inter-project) noise levels, it has been necessary to introduce acoustic mitigation measures for the Rosefield Substation in order to demonstrate compliance with the adopted significance criteria. With the addition of the BESS within Parcel 3, it would not be feasible to comply with the acoustic criteria.
3.29	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Page 18	Comment noting that the party does not consider that the effects on horses, sheep and cattle as a specific group of receptors has been assessed. As a result, they do not believe that the mitigation measures proposed can be known to be effective.	Please refer to the response provided to Ref. 3.31 .
3.30	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Pages 37 to 38	The party has submitted a letter from Equine Veterinary and Reproduction setting out the sensitivity of the horses at the property, with specific reference to noise and vibration.	The letter provided by Equine Veterinary and Reproduction is acknowledged and the comments provided regarding the potential impacts of noise and vibration on the donor herd are noted. Given the sensitivities of the livestock to acoustic conditions, a key factor that has not been set out in the letter is how existing sources of noise and vibration are adequately managed. Whilst it is acknowledged that the grazing fields will generally be relatively quiet areas, they are not devoid of acoustic influence that have the potential to trigger a negative impact. Sources of existing noise may include, but not be limited to: • Vehicle movements on local road links including Granborough Road. • Agricultural works involving noise emitting plant/machinery. • Regular aircraft movements, including microlights in the local area. • Deer stalking events in the wider area, resulting in impulsive shotgun fire.

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			• Exposure to noise from electrical infrastructure from the National Grid East Claydon Substation. • Corona discharge from overhead transmission lines within land parcels occupied by horses. • Members of the public traversing PRowWs. To address potential impacts associated with the Proposed Development, a range of acoustic mitigation measures have been committed to which are secured by the Outline CEMP [EN010158/APP/7.2.6], Outline OEMP [EN010158/APP/7.3.6] and Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.6] to reduce the noise and vibration levels experienced by livestock. The Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed Construction Environmental Management Plan(s) to establish tailored acoustic mitigation measures that account for the location(s) of the donor herd and the nature of the works, with consideration of the acoustic characteristics that are more likely to result in negative impacts. The Applicant will subsequently liaise with Preston Farms Ltd and TCS Biosciences Ltd during the construction phase, providing at least six months advance notification of the location and timing of any construction activities in proximity to the Prestons' grazing land. These commitments are secured in Section 2.22 of the Outline CEMP [EN010158/APP/7.2.6]. The 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. Ultimately, 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 high-noise activities 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 construction works. The Applicant maintains its position that measures can be developed to enable coalescence between livestock and the construction and operation of the Proposed Development, through the careful management of noise and associated mitigation measures that it has proposed.
3.31	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Pages 40 to 49	The party has submitted a report from Sharps Acoustic, titled 'Rosefield Solar Farm – Review of additional submissions on noise'. This report acknowledges that the process of consultation, monitoring and adaptive mitigation that the Applicant relies on is merited, but adds	As acknowledged by Sharps Acoustics Ltd (SAL), there is a lack of reliable studies which enable the onset of an adverse effect to be linked to a measured noise level for livestock, including sensitive donor herds. In the absence of a specific significance threshold, it has been assumed that there is a potential for significant adverse effects to occur, and therefore

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		that, where this approach is taken the mitigation framework should be clearly defined and secured. They continue that the Applicant has not provided enough detail in this instance, with particular reference to trigger levels, intervention criteria, decision-making responsibilities, implementation timescales or enforcement mechanisms, in relation to both construction vibration and operational noise. The comment goes further by setting out a list of matters that would need to be clearly defined and secured in order for the Applicant to rely upon the consultation, monitoring and mitigation approach.	in accordance with EIA Regulations, a range of mitigation measures has been introduced to control the noise and vibration levels. To establish the levels of noise and vibration that may trigger an adverse effect for the donor herd, this would generally require simulated activities to be undertaken, with livestock responses monitored by a veterinary specialist using heart rate monitors or other behavioural responses. Given the potential issues with this approach, it is unlikely to be viable to Preston Farms Ltd and TCS Biosciences Ltd. SAL list a range of acoustic characteristics that have the potential to influence behavioural or physiological responses in animals, however, it is evident that the horses may currently be exposed to a range of existing noise sources which may exhibit these characteristics. No evidence has been provided regarding the resultant effects of these existing sources on the donor herd. Sources of existing noise may include, but not be limited to: • Electrical infrastructure – noise from National Grid East Claydon Substation in adjacent grazing land, corona discharge from overhead transmission lines within land parcels occupied by horses. • Intermittency – road traffic, aircraft, agricultural works involving noise emitting plant/machinery. • Novelty/startle potential – machine start-up, people on PRoW, shotgun fire from deer stalking events in the wider area. • Ground-borne vibration - road traffic movement, agricultural plant and equipment, movement of other animals within the herd nearby. SAL list L_{Aeq} and L_{Amax} metrics (both A-weighted) as being relevant characteristics when assessing animal responses, however, this contradicts a previous statement within their document where they note that A-weighted metrics are not relevant. SAL also note that longer duration exposures may increase the likelihood of behavioural or physiological responses, however, no reference is made to the potential for horses to habituate to sound. A range of acoustic mitigation measures have been committed to which are secured by the Outline CEMP [EN010158/APP/7.2.6], Outline OEMP [EN010158/APP/7.3.6] and Outline DEMP [EN010158/APP/7.4.6] to reduce the noise and vibration levels experienced by livestock. To address potential impacts during the construction phase, the Applicant will liaise with Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed Construction Environmental Management Plan(s) to establish tailored acoustic mitigation measures that account for the location(s) of the donor herd and the nature of the works, with consideration of the acoustic characteristics that are more likely to result in negative impacts. This commitment is secured in Section 2.22 of the Outline CEMP [EN010158/APP/7.2.6]. The mitigation would not be determined solely by average noise levels. The Applicant will subsequently liaise with Preston Farms Ltd and TCS Biosciences Ltd during the construction phase, providing at least six months advance notification of the

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			location and timing of any construction activities in proximity to the Prestons' grazing land. This commitment is secured in Section 2.22 of the Outline CEMP [EN010158/APP/7.2.6]. SAL note that the mitigation strategy relies heavily upon a process of consultation, monitoring and adaptive mitigation, stating that the adaptive mitigation framework needs to be clearly defined and secured. SAL note that it is unclear how such adaptive mitigation could be secured with certainty given the nature of what the animals affected may do. The Applicant notes that the mitigation strategy would not be reactive based on monitoring thresholds (as these trigger levels don't exist), or implemented only upon observed negative effects. The mitigation would be discussed and agreed in advance as part of the detailed Construction Environmental Management Plan(s) preparation and during the six-month advance notification/consultation process. During this period, the presence of the livestock within the grazing fields would be a key factor, in terms of the mitigation that would be adopted, such as the use of rotary piling techniques in lieu of percussive. It is understood that the livestock are stabled during winter months, and therefore would not be affected in the same manner as horses present within external grazing land. There is also noted to be a rotation between arable and grazing fields which varies year to year, so that would also affect the mitigation requirements. In this instance, mitigation in the form of alternative working methods may not be necessary. In addition to conventional mitigation measures, the Applicant would work with Preston Farms Ltd to prioritise a means in which livestock can be located away from construction activities, including: • Undertaking works when livestock are stabled during winter months, where practicable. • Temporary use of other areas of land for livestock within the Order Limits during construction, away from the works. Regarding operational phase noise, SAL refer to the corrective measures that would be implemented post-installation if higher levels of tonality were identified and note that this would be challenging once installed and operating. The Applicant notes that the detailed tonality assessment in accordance with BS 4142 would be undertaken as part of the detailed design stage once the plant specifications are known. Should it be identified during the detailed design that tonality (or other characteristics) would be more perceptible than expected, the resulting specific sound level from the Site would be reduced to account for the higher penalty, such that the total rating limit secured within the Draft DCO would be met. As a result, the impact of noise from the Proposed Development would not be higher than that presented. The Applicant maintains its position that measures can be developed to avoid disturbance to livestock as a result of the construction and operation of the Proposed Development, through the careful management of noise and associated mitigation measures that it has proposed.

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Population			
3.32	Buckinghamshire Council [REP4-094] , Page 31	Comment noting that further consideration should be given to the adequacy and flexibility of the Education and Skills Fund within the outline ESSCP, including potential future increases in funding to address evolving demands and costs.	The Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14.3] [REP2-077], Section 3: Proposed Activities sets out the Applicant's commitment to provide an Education and Skills Fund in the sum of £50,000 per annum from the date of commencement to the date of decommissioning to support the priorities set out in the detailed Employment, Skills and Supply Chain Plan. The Fund would be flexible and the parameters for its allocation may be adjusted each year as directed by Buckinghamshire Council. The Applicant is aware that calls upon the Fund could vary – possibly significantly – from year to year within the context of challenges and opportunities. These could include infrastructure changes within the education and skills system; shifts in the availability of, and criteria for, funding from public, private or charitable sources; and fluctuations in demand for support. Within the context of knowledge and experience in establishing and applying an Education and Skills Fund for deployment in other locations, the Applicant is confident that significant value can be achieved within the £50,000 per annum limit proposed. The Applicant would, however, consider altering the timing of a funding allocation in order to respond to contemporary circumstances if required. This could include bringing forward an allocation of funding in advance of schedule if circumstances justify this, but the quantum of the Fund would remain at the equivalent of £50,000 per annum.
3.33	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104] , Pages 1 and 2	Comment noting that the party considers that the Applicant proposed to introduce multiple avoidable risks into a very limited donor animal blood production system without having assessed the risks or proposing appropriate mitigation measures secured in advance. The risk pathways within the comment included construction traffic, altered access, workforce movement, soil disturbance, dust, mud, vibration, visual disturbance, biosecurity and contamination risk, disruption to donor animal movements and collection sessions, loss of grazing land and loss of operational flexibility, across both construction and operational phases. Further comment noting that these risk pathways arise principally from interference with Field E23, use of Granborough Road, noise and visual interface with Parcel 3, and the proposed BESS interface.	The Applicant acknowledges the concerns about potential risks to the donor animal blood production system and has sought to avoid and/or mitigate these risks wherever possible. An Outline Biosecurity Management Plan [EN010158/APP/8.39] has been submitted at Deadline 5, which secures a suite of mitigation measures for biosecurity (as listed below). Further measures are detailed and secured in the Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.5] and Outline CEMP [EN010158/APP/7.2.6]. This includes: • Improved crossing of Granborough Road for livestock movements; • Only allowing pre-booked access to the construction site; • An offer for improved access junctions and fencing at the silage clamp; • Construction access track management with the use of banksmen; • Provision of a secure zone, removing potential contact from construction traffic to livestock; • Enhanced biosecurity measures to address the access from the promoted Public Rights of Way (PRoW) within the Site; • Provision of a controlled crossing point within the Site to enable safe and biosecure access over the track for livestock; and • An ongoing engagement protocol. The risk pathways related to noise and vibration are addressed at Refs. 3.29 to 3.31 of this document and the BESS interface is addressed at Ref. 3.47.

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			It should also be noted that the Landowner has offered replacement land for grazing land to be lost as set out in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4] [REP4-039] and the Applicant has offered additional temporary grazing land within Parcel 2 during the construction of Parcel 3 to address the risks raised by Preston Farms Ltd and TCS Biosciences Ltd.
Soils			
3.34	Buckinghamshire Council [REP4-094] , Page 32	Comment noting that, in relation to the updated Soil Chapter of the ES, it would be helpful if a numerical land use breakdown were included in the impacts table. Comment that the party had not understood the Applicant to be including the BESS and compounds as a permanent land loss and that this matter is unclear within the assessment (particularly Table 12.4 which contains errors)	The formatting of Table 12.4 in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.4] was corrected at Deadline 4. Table 12.4 presents the land use breakdown in hectares of the Proposed Development. Buckinghamshire Council is correct in the understanding that the BESS and Construction Compounds are not considered as permanent land loss. There is no permanent land loss considered in the assessment.
3.35	Buckinghamshire Council [REP4-094] , Pages 32 and 33	Comment noting that the updates to the Soil Chapter of the ES should be updated further to include the “A New Perspective on Land and Soil in Environmental Impact Assessment” guidance because this was published in January 2022, not 2026 as stated by the Applicant. Comment noting that this guidance should be used to assess the other soil services that may be impacted such as soil carbon and soil as a platform for landscape.	ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.4] uses the ISEP (formally ‘IEMA’) “A New Perspective on Land and Soil in Environmental Impact Assessment” guidance released in 2022 throughout the chapter. This guidance informs the assigning of receptor sensitivity, magnitude of impact and significance of effect. The guidance that has not been used is the ISEP “Soil Health in Environmental Assessment” guidance, which was released in 2026, following the submission of the DCO Application. This confusion was based on an error in the Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11] [REP2-085], which misidentified the 2026 ISEP guidance as the 2022 IEMA guidance. Other soil services mentioned by the Council, such as soil carbon and soil as a platform for landscape, are not considered relevant to the assessment in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.4]. It is extremely difficult to assess and quantify carbon storage numerically, while landscape and visual effects are assessed in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.4].
3.36	Buckinghamshire Council [REP4-094] , Pages 33 and 34	Comment noting that the Applicant may be underestimating soil sensitivity, with guidance indicating a higher risk of structural damage and insufficient mitigation proposed. Comment noting that the outline SMP should include seasonal constraints, clear responsibilities, and strengthened wording to prohibit soil handling above plastic limits and require testing.	The Applicant maintains that the Institute of Quarrying’s (2021) guidance ‘Good Practice Guide for Handling Soils in Mineral Workings’ that is referenced by Buckinghamshire Council is being applied correctly within the Outline SMP [EN010158/APP/7.7.4]. The guidance specifies that climate must be taken into account when classifying the risk of damage to soils, which the Applicant has done in classifying the clay soils on Site as of Medium resilience to structural damage. This is also consistent with the ISEP (formally IEMA) 2022 guidance ‘A New Perspective on Land and Soil in Environmental Impact Assessment’. The mitigation proposed in the Outline SMP [EN010158/APP/7.7.4], which includes use of track matting, use of low ground pressure vehicles and restrictions on works during wet

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			conditions has been agreed with Natural England, who are satisfied that the measures outlined afford the soils sufficient protection from damage during handling. While seasonal constraints on work cannot be committed to, the Outline SMP [EN010158/APP/7.7.4] does specify that soils will only be handled in dry conditions, and following a plasticity test conducted by a suitably trained individual. These measures have been accepted by Natural England. The wording of Section 3.2.4 has also been updated at Deadline 5 to make it clearer that any soil handling above the plastic limit is not permitted, as discussed with Buckinghamshire Council.
3.37	East Claydon Parish Council [REP4-095], Page 5	Comment querying how the Applicant plans to manage construction work (as well as maintain during the operation phase) in order to prevent damage to soils.	The Outline SMP [EN010158/APP/7.7.4] specifies that soils will only be handled in dry conditions, and following a plasticity test conducted by a suitably trained individual. The most sensitive soils from an assessment perspective, the area of Grade 2 and 3a land around Fields B8, B9 and B10 is relatively small (10.2 ha) and as this area will only be used for Solar PV development or green infrastructure (which requires only minimal soil disturbance), construction times will be minimal.
3.38	John Philip Claridge [REP4-105], Pages 1 and 2	Comment noting concern that, upon review of the Agricultural Land Classification Report, there are concerns with how the soil results have been logged. Comment noting that the Report contains points on the party's land as being "auger" tested. Further comment noting that no permission was granted to undertake such intrusive survey works.	The auger borings at points specified by Mr Claridge (46, 47, 51, 52 and 64) were undertaken as part of the ALC survey conducted by LRA in January 2023 for which access was granted by the Claridge family. Surveyors began discussions with the Claydon Estate regarding the ALC surveys in September 2022, and met a member of the Claridge family on-site in person on 23 January 2023. Access was granted for the land east of Knowl Hill, including pit 45 and auger points 47,52,46, 51 & 64 (those contested by Mr Claridge) on 24th and 25th of January 2023. The unsurveyed land specified in the Desk Based Study in Section 3 of ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.3] highlighted by Mr Claridge is another area. The Agricultural Land Classification Report contains a combination of findings from RSK ADAS surveys conducted over January and June 2023, June 2024 and March 2025, LRA surveys conducted over October 2022 and January 2023, and unsurveyed areas predicted to be Grade 3b land, as agreed with Natural England.
3.39	John Philip Claridge [REP4-105], Page 2	Comment noting that point 45 within the Agricultural Land Classification Report is marked as being surveyed, though the party considers this to be untrue and misleading. Comment noting that the Report does not accurately reflect the party's understanding of the land within their holding. Further comment that the soil type of the party's land to be Grade 3a, not Grade 3b.	Point 45 is a pit that was dug as part of the ALC survey conducted by LRA in January 2023, the results of which are presented in ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.3] to assign the land an ALC Grading. Surveyors began discussions with the Claydon Estate regarding the ALC surveys in September 2022, and met Mr Claridge on-site in person on 23 January 2023. Access was granted for the land east of Knowl Hill, including pit 45 and auger points 47,52,46, 51 & 64 (those contested by Mr Claridge) on 24 and 25 of January 2023. Annex 3a in ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.3] mistakenly shows four soil pits, including pit 45 mentioned by Mr

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			Claridge, as having been dug by RSK ADAS. These pits were actually dug by LRA, as is correctly shown in Annex 3b. Annex 3a, showing the RSK ADAS auger and pit locations, has been updated at Deadline 5 to remove reference to pits dug by LRA. The ALC Grade 3b was assigned in accordance with the 1988 MAFF guidance 'Agricultural Land Classification for England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land'. Auger boring logs in Annex 4a of ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4.3] show land in this area to have a gleyed slowly permeable layer within 40cm. Combined with the Site field capacity days of 136-142, as specified in Table 4.1, this places the soils in Wetness Class IV. Clay and Clay loam soils in Wetness Class IV are assigned a Grade according to wetness of 3b, which in this instance is the overall ALC Grade for this area of land.
Transport and Access			
3.40	Buckinghamshire Council [REP4-092] , Pages 4 and 5 and Buckinghamshire Council [REP4-094] , Page 3	Comment requesting that the Applicant provides further justification, including the relevant guidance relied upon in relation to the glint and glare assessment, and a clear explanation of how safety risks have been considered independently of traffic volumes.	NPS EN-3 does mention roads (motorists) and PRowS in the list of elements to be considered within a GGA (glint and glare assessment), but it does not provide a method of assessment nor any means of determining significance. In the absence of formal guidance, Pager Power's informal guidance (Solar Photovoltaic and Building Development – Glint and Glare Guidance) which is presented in Appendix 1 of ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4.2] is currently considered best practice in the industry, and the vast majority of solar farm DCOs in the UK (if not all) refer to it. Pager Power's guidance is based on safety for roads, rail and aviation, and amenity for dwellings. Section 7 of the guidance details how road receptors should be identified and classified, how the assessment should be undertaken and how the significance of effects should be determined. The process for determining significance of effects is detailed in a flow chart in section 7 (figure 13). This chart shows that effects to Local roads should be classified Low impact and that mitigation is not required. The Applicant has considered the potential for glint and glare impacts to each of the local roads within 1km of the solar PV development and provided commentary on these within the GGA at section 8.1. The Applicant has noted some instances where solar reflections may be possible to the drivers of cars approaching the solar PV modules travelling either east or west along School Hill, Orchard Way and Hogshaw Road, but it is notable that the sun would also be visible at these times and visible in the same direction as the solar PV modules, as such they would not conceivably be producing an effect not already present to drivers on these roads. Additionally, the vast majority of these roads are lined with dense hedgerows which will largely obscure the solar PV modules.
3.41	Buckinghamshire Council [REP4-094] , Pages 35 and 36	Comment noting that the party does not support reliance on elected members alone to represent business and tourism interests on the Traffic Management Group.	The Applicant disagrees with the position of Buckinghamshire Council. Elected members and parish councillors are ideally placed to represent the views of residents and businesses in the area and the Applicant has offered to discuss this matter further with

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		Comment noting that proportionate inclusion of these stakeholder groups is necessary to ensure informed, responsive input on construction-related impacts, particularly given seasonal and location-specific considerations.	senior Councillors following the Transport and Access Session of Issue Specific Hearing (ISH) 3. The strategic nature of the Traffic Management Group would make invitations to all business interests in the area unmanageable. The Applicant agreed at ISH3 to extend the invitation to TCS Biosciences Ltd at their request and due to the nature and proximity of their business operations.
3.42	East Claydon Parish Council [REP4-095] , Page 2	Comment noting that commitments to measures to ensure that staff minibuses and private vehicles travelling to the Site will be required to avoid local villages or that this would be enforced	Staff minibuses and private vehicles are classed as construction traffic and as such, all these measures would be controlled under the measures contained in the Outline CTMP [EN010158/APP/7.5.5] .
3.43	East Claydon Parish Council [REP4-095] , Pages 13 and 14	Comment noting that the traffic and transport assessment fails to account for wider network effects, where increased traffic in one area can result in consequential impacts elsewhere.	The Assessment has been undertaken correctly, and has been accepted in full by Buckinghamshire Council as noted in the Draft Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5] .
Water Environment (including flood risk and drainage)			
3.44	The Environment Agency [REP4-100] , Pages 1, 2 and 5	Comment noting a request for the Draft DCO to include a requirement to ensure no development shall take place within the design flood extent until detailed hydraulic modelling and a mitigation plan have been approved in consultation with the party. Comment noting that should the modelling show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme.	The Applicant has updated the Draft DCO [EN010158/APP/3.1.8] at Deadline 5 to include the following new Requirement to address the Environment Agency's concerns. This drafting has been agreed with the Environment Agency. Design Flood Extent <i>(1) No part of the authorised development may commence within the design flood extent until:</i> <i>(a) a detailed volumetric calculation (or hydraulic modelling if appropriate); and</i> <i>(b) a mitigation plan (if required in accordance with sub-paragraph (2)),</i> <i>have been submitted to, and approved by, the relevant planning authority, in consultation with the Environment Agency.</i> <i>(2) A mitigation plan will be required under sub-paragraph (1) if the detailed volumetric calculation (or hydraulic modelling if appropriate) referred to in sub-paragraph (1)(a) shows increased flood risk in the area as a result of the authorised development.</i> <i>(3) A mitigation plan must include a floodplain compensation scheme which is maintained for the operational lifetime of the authorised development and provides for –</i> <i>(a) the implementation of compensatory storage prior to the associated floodplain loss;</i> <i>(b) a mechanism to achieve no net loss of floodplain within the design flood event and no net increase in flood risk elsewhere, supported by volumetric calculation (or hydraulic modelling if appropriate); and</i>

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			(c) compensation provided on a volume-for-volume and level-for-level basis where appropriate. (4) Any mitigation plan must be implemented as approved.
3.45	The Environment Agency [REP4-100] , Pages 5 and 6	Comment noting that once the final wording of the outline CEMP commitment is agreed in relation to providing compensatory flood storage should detailed design modelling demonstrate an increase in flood risk elsewhere, the Applicant is requested to update the Commitments Register.	The Applicant has updated the Commitments Register [EN010158/APP/6.4.3] at Deadline 5 to align with the agreed wording set out in the Outline CEMP [EN010158/APP/7.2.6] related to compensatory flood storage.
BESS			
3.46	East Claydon Parish Council [REP4-095] , Page 12	Comment noting that whilst prevailing wind may be southwesterly, the projected wind directions over a 7-day period in Winslow demonstrate that there are frequent changes of direction. Comment that the Applicant should consider other receptors beyond those within its BESS Plume Assessment Summary to take account of varying winds.	The BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042] models BESS fire emissions in a worst-case scenario, namely in all wind directions recorded over a five-year meteorological period (2020-2024). Please refer to section 4.2 of this study which outlines the meteorological data that has been used to ensure worst case prediction has been presented for each receptor within the report. The assessment has been undertaken to be deliberately conservative, accounting for five years of meteorological data looking at all possible wind directions, several possible locations of battery thermal runaway incident, a conservative incident release rate and concentration, an assumed failure of multiple layers of safety system built into the batteries etc. All sensitive residential and public footpath receptors have been reviewed within a conservative zone of impact.
3.47	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104] , Page 14	Comment noting that the party does not accept that the updated BESS Plume Assessment Summary or Design Commitment D25 properly address their concerns. They consider that the proposed 50m buffer does not resolve the issue or address their concerns in relation to the lack of assessment for their operation and livestock as a specific receptor. The party does not consider that the 50m buffer is sufficient to protect the specific receptor who would be affected. Further comment requesting further action, either in relocating or further reconfiguring the BESS, or securing specific controls addressing emergency response times and mitigation.	The Applicant has fully addressed this issue in the Applicant's Response to Action Point 45 from ISH1 [EN010158/APP/8.26] [REP4-084]. As explained in Sections 3.1.8 and 3.1.9, the contour in Figure 4 demonstrates that the 10-minute HF AEGL 1 (860 ug/m3) would not be exceeded at receptors more than 50m away. As a result, the Applicant has included an additional commitment in the Design Commitments [EN010158/APP/5.9.7] to ensure that the BESS containers will be offset at least 50m from the southern boundaries of Fields D8 and D9 and the eastern boundary of Field D9, to provide further comfort to Preston Farms Ltd and TCS Bioscience Ltd that the HF 10-minute levels would be below the 10-minute AEGL-1 limit threshold within the surrounding livestock fields in the event of a thermal runaway occurrence. Therefore, this additional commitment ensures that even if the horses or workers were positioned at the very edge of the adjacent fields to the BESS, Fields D8 and D9, and were not evacuated away during a BESS fire incident, their exposure to any contaminants would still be below the AQO and AEGL guidance limit. It is also highly likely that if there were a BESS fire event, workers and livestock would move away from the field boundary and noise/fire to another part of the field away from the incident, which would further limit their exposure to contaminant levels. Contaminant levels at other locations away from the field

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			boundaries, in the adjacent fields are unlikely to have a transient effect on receptors due to the very low contaminant levels at this distance away from the BESS.
3.48	Claydons Solar Action Group [REP4-103] , Page 20	Comment noting that, in relation to the BESS Plume Assessment Summary, the Applicant's reliance on a LOPA analysis to assert a very low probability of thermal runaway is challenged and unjustified as being potentially misleading due to unsupported assumptions. Comment noting that the assessment lacks adequate methodological transparency, with insufficient explanation of how input values were derived across the LOPA matrix.	The first initial LOPA analysis that was included in the original BESS Plume Assessment Summary was refined at version 2 as errors were found within the original calculation and further barriers were added to the LOPA based on the Applicant's understanding of the concept design battery technology and minimum qualification and procurement checks that would be carried out prior to selecting a suitable and good quality BESS supplier. The LOPA was therefore updated, and the Applicant believes that this updated BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042] remains generally conservative. It is not expected that the order of likelihood of failure will vary significantly when the final LOPA is carried out, which will be at preconstruction stage once the final battery chemistry and specification has been confirmed. This final calculation of the LOPA is secured in the Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.5] [REP4-074] and by Requirement 6 of the Draft DCO [EN010158/APP/3.1.8]. At this stage of the design the LOPA is therefore indicative only and estimated, The Applicant conducts this exercise to ensure that the illustrative design integrates the key BESS safety system components (detection, protection, monitoring, mitigation, etc.) required by UL, IEC, IEEE, NFPA, DNV, and NFCC guidance and standards. Each barrier system is an independent event; therefore, the probability ratings can be stacked up against one another in the LOPA analysis calculation. The current values have been based on engineering judgement and test estimates to provide an order of magnitude of failure. The values assigned are the Applicant's assessments based on the credible layers of protection in accordance with documentation such as that produced by DNV, specifically for the assessment of BESS safety.
3.49	Claydons Solar Action Group [REP4-103] , Page 21	Comment noting that evidence suggests lithium battery failure rates may be materially higher than implied by the Applicant, presenting a non-negligible risk of fire events over the system lifetime. Comment noting that clarification is required on the definition of thermal runaway, distinguishing between dendrite growth (causing a short circuit fire) and cell overheating, as these represent different risk mechanisms.	Section 6.1.1 of the Outline BSMP [EN010158/APP/7.9.5] [REP4-074] stipulates: The detailed design phase would consider the lifecycle of the battery from cradle to grave. A large number of studies would be undertaken, with a focus on fire risk including, but not limited to, studies in line with risk analysis and management tools such as Hazard and Operability Analysis and Hazard Identification (HAZOP/HAZID), Failure Mode and Effects Analysis (FMEA), Bowtie risk assessments and Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) to inform the overall design solution. An agile method is applied during the engineering design phase for fire safety analysis. The analyses are updated based on any changes of the project context and during the design process from the selected contractors in case of any deviation from the initial set of technical requirements. These would be finalised before construction commences. These risk assessments and consequence modelling reports will specifically define the BESS system specific potential failure modes and ensure risk is minimised and fully mitigated

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			should any type of BESS system failure occur. Analysis considers all elements of a BESS system design and not just the battery system. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [EN010158/APP/7.9.5] [REP4-074] pre-construction requirements (Section 7). Risk Assessment tools such as FMEA reports specifically focus on a range of failure mechanisms and identify how to prevent and/or mitigate credible failure scenarios.
3.50	Claydons Solar Action Group [REP4-103] , Page 21	Comment noting that the BESS Plume Assessment Summary omits assessment of some very hazardous organophosphorous compounds. Further comment that remarks about PM 10 and PM 2.5 are not properly quantified.	The scope of the BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042] is based on the UKHSA criteria, NFCC guidance and Local Air Quality Management Technical Guidance (LAQM TG22) published by DEFRA. The UKHSA is a Statutory Consultee for the Proposed Development and has advised that the Applicant's BESS fire emission risk analysis and consequence modelling "provides a logical approach and assesses a worst-case scenario of chemical emission concentrations during a BESS fire event at relevant receptor locations. The findings of the addendum report alongside the previous submitted plume assessment suggests that the risk to public health for nearby receptors from chemicals emitted during a BESS fire event is likely to be low." The BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042] presents the findings of the impact assessment from the emissions of Carbon Monoxide, Hydrogen Chloride, Hydrogen Fluoride, Hydrogen Cyanide, Nitrogen Dioxide, Butadiene, Benzene and included an assessment of the particulate matter (PM₁₀ and PM_{2.5}) emissions. The results of this assessment predict no exceedances of any Acute Exposure Guidance Levels (AEGs) and Air Quality Standards (AQS) at any receptor because of a BESS incident. The Applicant acknowledges the reference to alternative particulate and gas emission factors in CSAGs submission (e.g. Claassen et al. (2024)); however, these do not provide a directly comparable or more appropriate basis for defining emissions from the Proposed Development. Emissions data for BESS fires, particularly for particulates (including smaller particles), remain limited and highly variable, depending on battery design, chemistry, state of charge, test configuration, and scale. The Applicant further acknowledges 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 the high uncertainty associated with the emissions from smaller particles (discussed above) with which to make a fully quantitative dispersion modelling assessment, an alternative assessment approach has been undertaken and detailed in Applicant's Response to Action Point 45 from ISH1 [EN010158/APP/8.26] [REP4-084]. Section 5.2.10 of the Outline BSMP [EN010158/APP/7.9.5] [REP4-074] stipulates: Another plume assessment would be completed once the battery modules for the Proposed Development have been selected at detailed design to demonstrate that the risk of thermal runaway and impacts from such

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			thermal runaway will be no worse than as assessed in the BESS Plume Assessment Summary [EN010158/APP/7.13.3] [REP3-042] submitted with the Application. This informs the design prior to construction and ensure specific battery chemistries are considered along with all appropriate safety mitigation measures being put in place. The Applicant confirms that BESS Fire Emissions Modelling of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable to capture every type of battery gas & particle emitted during the thermal runaway process at battery module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions and Particulate Matter can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing. This final Plume Analysis Study undertaken at the detailed design stage, will be based on BESS-specific fire testing data for the selected system. This will allow refinement of emissions characterisation (including particulates and trace compounds where measurable) and ensure the Emergency Response Plan is informed by the most up-to-date and representative data available.
Other Matters			
3.51	Buckinghamshire Council [REP4-093] , Page 14	Comment requesting a detailed Waste Management Plan.	Should consent be granted for the Proposed Development, the Applicant will produce a detailed Site Waste Management Plan, following the detailed design. The detailed Site Waste Management Plan will be prepared by the contractor and will identify waste streams, plan appropriate arrangements and procedures accordingly, ensure legal requirements are identified and complied with and identify opportunities for waste minimisation and sustainable material use. The Site Waste Management Plan will be based on the Outline Site Waste Management Plan (Outline SWMP) contained in Appendix 1 of this Outline CEMP [EN010158/APP/7.2.6] and finalised with specific measures to be implemented prior to the start of construction. This is set out and secured in the Outline CEMP [EN010158/APP/7.2.6] and would be subject to consultation and approval by Buckinghamshire Council.
3.52	East Claydon Parish Council [REP4-095] , Page 4	Comment noting that “the commitment” to sheep and cattle grazing is set out in REP2-067 with further	The Applicant refers the party to their response to Q2.15.4 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082] and paragraphs 3.3.27 and 5.2.2-5.2.7 of the Outline LEMP [EN010158/APP/7.6.6].

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		comment requesting that the Applicant directs the party to the commitment. Comment noting that Appendix 6 of the outline LEMP seems to conflate 'propose' and 'commit'.	The Applicant has indicated its willingness to arrange grazing as part of the long-term management regime (and has had positive initial discussions with local suppliers who could provide either sheep or cattle grazing) within the Outline LEMP [EN010158/APP/7.6.6] . This recognises that the presence of livestock may have some advantages but also that there may be factors outside of the Applicant's control over the 40-year operational period that could prevent grazing. 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).
3.53	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Pages 15 and 16	Comment noting that the Secretary of State should treat potential disruption to diagnostic supply as a public disbenefit in the compulsory acquisition balance. Further comment noting that the party has not shown a compelling case in the public interest for broad compulsory acquisition or temporary possession powers.	The Applicant does not agree with this position and refers to its response to this point at Q2.6.2 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010158/APP/8.23] [REP4-082] . The Applicant restates that it has satisfied the tests for compulsory acquisition in the Statement of Reasons [EN010158/APP/4.1.4] which sets out how the Applicant has complied with section 122 of the Planning Act 2008 in respect of all the land in which the Applicant seeks powers of acquisition and temporary possession over – including land in which Preston Farms Ltd has an interest in. Sections 5.3 and 5.5 of the Statement of Reasons [EN010158/APP/4.1.4] address how the limbs of the conditions in section 122 have been met.
3.54	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Pages 16 and 17	Comment noting the party's update on negotiations regarding compulsory acquisition of land. This notes that no voluntary agreement has been reached but that discussions are ongoing, and that detailed tenancy documentation remains under negotiation.	Negotiations are taking place between the Claydon Estate and Preston Farms Ltd in respect of a new tenancy agreement to replace the agreement that expires on 30 September 2026. A meeting is to be held on 30 July 2026 between both parties with a view to agreeing documentation with signatures following shortly after. If the agreement is reached it will mean the landlord will have the ability to gain possession and provide the necessary rights required to enable the development, and the Applicant will only need compulsory acquisition powers for a cable and access easement over Preston Farms Ltd's freehold ownership. If agreement is not reached, Preston Farms Ltd will need to vacate the land required for the Proposed Development and CA powers would be needed for the cable corridor and access route over land tenanted by Preston Farms Ltd but this would result in Preston Farms Ltd having a significantly smaller overall land holding and operation, as this would not result in replacement land being occupied.
3.55	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Pages 19 and 20	Comment noting, with reference to a previously referred to Parliamentary answer, that the party is one of only two producers of donor animal blood in the United Kingdom, and that this should not be confused with suppliers of this product, of which there may be more.	The Applicant acknowledges this clarification but refers to its previous comments provided in its Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049] and maintains its position that Mr Ahmed's comments provide evidence of the NHS's supply resilience.
3.56	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Page 21	Comment acknowledging that there are areas within the holdings where animals pass through spaces of less than 90m, noting that these are short, familiar, staff-controlled movements.	The Design Commitments [EN010158/APP/5.9.7] have been updated at Deadline 5 to reflect the latest position on animal movements through Field E23, following ongoing discussions with Preston Farms Ltd.

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
		Comment noting that those movements should not be considered comparable to a long corridor through or beside solar infrastructure which includes run distances of approx. 500m. Further comment that it would be impractical for the party's staff to manage animal movements appropriately along that distance.	It is worth noting that the route which leads to Middle Farm is approximately 9m wide and 60m long. The route, which is a driveway shared with residential properties is not noted by Preston Farms Ltd in its response but would appear to suggest that "long" enclosed corridors are manageable for the farming operation.
3.57	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104], Page 25	Comment noting that the party does not accept that key protections can be deferred to future discharge of requirements of later management plans. Further comment that it is not considered adequate to rely on future management plans to manage impacts. Further comment that ordinary requirement discharge by a local planning authority is not an adequate substitution for the party's required specific controls.	The Applicant does not agree with this position. The documents listed in Schedule 13 (Documents and Plans to be Certified) of the Draft DCO [EN010158/APP/3.1.8] – which include all of the outline management plans – will be certified by the Secretary of State if the Order is granted. This means that the certified documents form part of the statutory instrument, giving them legal status as part of the consent framework. Certified documents are enforced through the DCO requirements, and the Applicant notes that any breach of a made DCO is a criminal offence. The suite of outline management plans establish the framework within which the detailed plans must later be prepared substantially in accordance with, which is entirely appropriate and standard practice across a huge number of consented DCOs, given the detailed design of the Proposed Development will not be finalised until post-consent. The outline management plans secure binding commitments for the benefit of Preston Farms Ltd and TCS Biosciences Ltd. To date, the Applicant has updated its management plans in direct response to Preston Farms Ltd and TCS Biosciences Ltd's concerns with the commitment that it will liaise with Preston Farms Ltd and TCS Biosciences Ltd during the preparation of the detailed management plans. This is to ensure that the most responsive and effective mitigations relevant at that time are included within the detailed plans. As per the outline plans, this engagement will include: • providing at least six months advance notification of the location and timing of any construction activities in proximity to the agricultural tenants' and the Prestons' grazing land; • appropriate biosecurity measures reflective of the agricultural tenants' and the Prestons' own biosecurity practices, to minimise any potential disruptions and biosecurity risks to their business operations (see Outline Biosecurity Management Plan [EN010158/APP/8.39]); and • provision of toolbox talks to relevant site staff about the sensitive nature of the agricultural tenants' and the Prestons' specialist operations, and the processes around the measures above. As submitted at Deadline 5, the Applicant has further updated the outline management plans to include that Preston Farms Ltd/TCS Biosciences Ltd has the option to be a member of the Proposed Development's Traffic Management Group in the updated Outline CTMP [EN010158/APP/7.5.5] and the Applicant has also appended the updated Outline Biosecurity Management Plan [EN010158/APP/8.39] to the Outline CTMP [EN010158/APP/7.5.5], Outline CEMP [EN010158/APP/7.2.6] and Outline OEMP [EN010158/APP/7.3.6]. The Outline Biosecurity Management Plan

Ref.	Submission Reference and Identifier	Summary Position	Applicant's Response
			[EN010158/APP/8.39] accepts the majority of the requests that Preston Farms Ltd/TCS Biosciences Ltd have made and therefore ought address their biosecurity concerns in terms of how the Applicant will carefully manage the Proposed Development. Appending it to the outline management plans ensures that it forms part of the documents to be certified and is therefore secured mitigation. The detailed management plans must be prepared substantially in accordance with these outline plans, and in seeking to have the detailed management plans approved, the Applicant will need to evidence how it has satisfied the commitments in the relevant outline plans, including its engagement with Preston Farms Ltd/TCS Biosciences Ltd (for example, by way of an engagement log) and how it has met the requirements of the Outline Biosecurity Management Plan [EN010158/APP/8.39] to provide Buckinghamshire Council with the confidence to discharge the requirement and approve the plan. Ultimately it is within the control of Buckinghamshire Council – having consulted with anyone else it considers necessary – not to approve any of the final detailed plans/strategies if they do not consider the necessary measures are appropriately secured, especially where the failure to do so could result in worse effects.
3.58	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104] , Pages 26 to 28	The party has submitted two supporting letters at Deadline 4 from UK Health Security Agency and The Royal College of Pathologists. These set out the importance of the product that the party produces.	The Applicant acknowledges these letters and is in agreement regarding the importance of the product.
3.59	Preston Farms Ltd and TCS Bioscience Ltd [REP4-104] , Pages 4 to 12	Comment setting out further detail to the initial draft set of requirements on biosecurity that the party submitted at Deadline 3. This includes an expanded list of measures that the party would require if construction activity was introduced alongside funding requirements and indemnity and compensation mechanism. The party also requests that they must be consulted and have the final approval for any method statement of management plan affecting their land, animals, donor operations, access, feed, biosecurity or product transfer routes.	The Applicant welcomes the further detail on biosecurity submitted at Deadline 4. An Outline Biosecurity Management Plan [EN010158/APP/8.39] has been submitted to secure the measures requested. The majority of the measures requested will be implemented.

Appendix 1

Detailed Cultural Heritage Response



Cultural Heritage

1.1. Introduction

- 1.1.1. This appendix has been produced by the Applicant to provide a response to Buckinghamshire Council's assessment of harm on each of the assets where there is disagreement, per the summary table in Buckinghamshire Council's submission [\[REP4-090\]](#) and to respond to Action Point 15 arising from Issue Specific Hearing 3.

1.2. Summary position

- 1.2.1. The Applicant welcomes the inclusion of a summary table within Buckinghamshire Council's response [\[REP4-090\]](#). The table at page 14 of [REP4-090](#) presents a summary of the Applicant's and Buckinghamshire Council's conclusions on the levels of harm and the significance of effect.
- 1.2.2. Buckinghamshire Council acknowledged in ISH3 that they had made a typographical error in regard to the Applicant's conclusion on the level of harm to Rosehill Farmhouse and outbuildings. This should read that the Applicant considers there to be harm at the lower end of the scale of less than substantial harm.
- 1.2.3. Whilst the Applicant does not dispute the majority of the additional descriptive detail of the heritage assets presented by Buckinghamshire Council within [REP4-090](#), there are remaining areas of disagreement with regard to:
- 1) the detail of certain elements of significance or setting with regard to specific assets,
 - 2) the relative weight given to the contribution of setting to significance,
 - 3) the magnitude of impact on certain assets,
 - 4) the level of less than substantial harm to certain assets; and,
 - 5) the significance of effect in EIA terms on certain assets.
- 1.2.4. These areas of disagreement are discussed in more detail below.
- 1.2.5. The Applicant notes that there are further areas of agreement with regard to the magnitude of impact to several heritage assets within [REP4-090](#). Table 1 below builds upon the table at page 14 of [REP4-090](#) and summarises the Applicant and Buckinghamshire Council's respective positions with regard to 1) magnitude of impact, 2) level of harm to significance, 3) significance of effect. Within Table 1 below, highlighting has been used as follows to assist in understanding the level of

agreement: green highlighting represents areas where the Applicant and Buckinghamshire Council are in full agreement, yellow highlighting represents areas where the agreement is nuanced. This table is also appended to the **Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.5]** submitted at Deadline 5 and has been agreed with Buckinghamshire Council as reflecting the respective positions of each party.

Table 1 - Summary of areas of agreement and disagreement between the Applicant and Buckinghamshire Council

Asset	Applicant's assessment of magnitude	Council's assessment of magnitude	Applicant's assessment of level of harm	Council's assessment of level of harm	Applicant's assessment of significance of effect	Council's assessment of significance of effect
Claydon House and Park	minor	minor	lower end of less than substantial	middle of less than substantial	slight	moderate
The Fernery and Arch and wall to stables	negligible	negligible	lower end of less than substantial	lower end of less than substantial (but greater than applicant's assessment)	neutral	slight
All Saint's Church	negligible	minor	lower end of less than substantial	middle of less than substantial	slight	moderate
Botolph Claydon Conservation Area	minor	moderate	lower end of less than substantial	middle of less than substantial	slight	moderate
Botolph House	minor	minor	lower end of less than substantial	middle of less than substantial	slight	moderate
East Claydon	minor	moderate	lower end of less than substantial	middle of less than substantial	slight	moderate
St Mary's Church	negligible	minor	lower end of less than substantial	middle of less than substantial	slight	moderate
Rosehill Farmhouse and Barns	negligible	minor	lower end of less than substantial	middle of less than substantial	neutral	slight (upper end)
Blackmoorhill Farmhouse	negligible	minor	lower end of less than substantial	middle of less than substantial	neutral	slight
Pond Farmhouse	moderate	major	middle of less than substantial harm	upper end of less than substantial harm	moderate	moderate verging on large
Bernwood House	moderate	moderate (close to major)	middle of less than substantial harm	upper end of less than substantial harm	slight	slight

Green highlighting represents matters of full agreement between the parties

Yellow highlighting represents matters where there is partial agreement

1.3. Commentary on methodology

- 1.3.1. The Applicant understands from discussions with Buckinghamshire Council's built heritage advisor that the conclusions on harm to significance and significance of effect presented within [REP4-090](#) represent their assessment of cumulative impacts, not solely the impact of the Proposed Development in isolation. This approach differs to that of the Applicant within the EIA, where the impacts of the Proposed Development in isolation are presented within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4]** and the cumulative impacts with other schemes are included within **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.4]**. This difference of approach is part of the reason for the differences in conclusions regarding the levels of harm and significance of effect between the Applicant and Buckinghamshire Council. As consultees to the DCO Application Buckinghamshire Council are not obliged to follow the same EIA structure as the Applicant in their response, however the Applicant considers that where terminology and criteria have been agreed they should be consistently applied.
- 1.3.2. Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]** includes consideration of where previous (or ongoing) development and other changes within the setting of heritage assets has altered their original setting. Whilst the Applicant acknowledges that an appreciation of the historic or original setting of heritage assets informs an understanding of the asset, the Applicant considers that it is the *current* baseline setting against which changes that would be introduced by the Proposed Development should be considered.

1.4. Magnitude of impact and level of harm to significance

- 1.4.1. The Applicant's position (as set out within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4]**) is that magnitude of impact in EIA terms relates to the level of harm to significance in NPPF terms. This is set out within paragraph 9.6.16 of **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4]** which states that:
- "To assist with the assessment of "harm" as required in NPS EN-1 [Ref. 9-10], NPS EN-3 [Ref. 9-11] and NPPF [Ref. 9-13], adverse impacts of major magnitude are considered to equate to "substantial harm", whilst adverse impacts of moderate, minor or negligible magnitude are considered to represent scales of "less than substantial harm". Situations where "no change" is predicted represent no harm to the heritage significance of a heritage asset. Beneficial impacts represent enhancements to heritage significance."

- 1.4.2. It is therefore the Applicant's position that Buckinghamshire Council have overstated the level of harm to significance to the heritage assets where the magnitude of impact is agreed. Further details are provided for each asset below.

1.5. Discussion of individual assets

- 1.5.1. This section details the areas of agreement with Buckinghamshire Council and presents the Applicant's position regarding the remaining areas of disagreement.

Claydon House and Park

- 1.5.2. The Applicant welcomes the additional descriptive detail of the house and the ancillary buildings. The additional description does not alter the Applicant's conclusion that Claydon House derives the majority of its significance and its principal reason for designation from its architectural and historic interest inherent within its fabric and its associations with the Verney family.
- 1.5.3. The Applicant disputes that "the south west frontage was the principal elevation" [\[REP4-090\]](#) page 2. The orientation of the 18th century parts of the building, which was unfinished but originally intended to extend further north and include a second wing beyond a central atrium (similar in style to Stowe), demonstrates that at that time the principal elevation would have been on the west side (more precisely the west northwest facing elevation). The south (or south west) facing elevation is the result of the 19th century remodelling when the Verney family took up residence.
- 1.5.4. The Applicant agrees that the relationship with the parkland beyond the registered park south of Orchard Way contributes to the significance of the listed building and registered park and that the historic relationships (associations) with the estate farms contributes to the significance of Claydon House as the centre of an estate. However, the areas closest to the park, and those visible from the south façade of the house, will be used only for the Interconnecting Cable Corridor comprising below ground cabling and an Internal Access Road. National Trust have granted Covenant Consent for these works, and concur that there would be minimal impact on the heritage significance or amenity of Claydon House resulting from these works. The Applicant has acknowledged that the presence of the Proposed Development within the wider estate will result in an adverse impact (harm to significance).
- 1.5.5. Both parties agree that the magnitude of impact to Claydon House and Park is minor adverse (i.e. that the heritage significance is slightly compromised, see **Table 9.6 of ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.4]** "Criteria for classifying magnitude of impact upon heritage significance"). The Applicant considers that "slightly

compromised” significance would equate to a low level of less than substantial harm. Historic England and National Trust both concur with the Applicant’s assessment of less than substantial harm at the lower end of the scale (as set out within the **Statement of Common Ground with Historic England [EN010158/APP/5.16.3] [REP4-017]** and **Statement of Common Ground with National Trust [EN010158/APP/5.17.2] [REP2-020]**).

- 1.5.6. The Applicant therefore considers that Buckinghamshire Council’s position regarding the level of harm to significance to Claydon House Grade I Listed Building and Claydon Registered Park and Garden is not consistent with the criteria for classifying magnitude of impact as minor and that Buckinghamshire Council have overstated the level of harm to significance that would occur to Claydon House and Park.

The Fernery and Arch and wall to stables

- 1.5.7. The Applicant welcomes agreement with Buckinghamshire Council that the primary contribution of setting to the significance of these buildings is their relationship with Claydon House. The Applicant notes that this relationship will not be altered by the Proposed Development.
- 1.5.8. The Applicant does not dispute that there would be change within the wider setting but considers that there would be a negligible impact on the heritage significance of these listed buildings. The Applicant notes that Buckinghamshire Council concur with this assessment of the magnitude of impact.
- 1.5.9. As noted in Table 1, whilst both parties are agreed that the harm to the significance of The Fernery and Arch and Walls to the Stables will be at the lower end of less than substantial, Buckinghamshire Council consider the significance of effect to be slight rather than neutral due to the effects on associated buildings. As noted in **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]** the Applicant finds (at paragraph 9.10.12) that the distance to the Proposed Development lessens the effect of construction and decommissioning activity and concludes that the effect during these phases would be neutral. The Applicant further concludes (at paragraph 9.10.66) that the lower option of neutral significance during the operational phase is reasonable as the assets have been assigned high importance (rather than the more usual medium importance for a Grade II listed buildings) due to the association with Claydon House. This association will not be lost, and will still be appreciated even with the changes to the wider surroundings. The Applicant therefore considers that Buckinghamshire Council have overstated the significance of effect.

All Saints Church

- 1.5.10. Whilst the Applicant is in agreement with Buckinghamshire Council that the prominence of the church contributes to its significance, the Applicant disputes Buckinghamshire Council's statement that approaches along Orchard Way would be affected. The Applicant has offset areas of Solar PV from Orchard Way within Fields B23 (North) and the eastern side of B22 and has excluded Solar PV development from Field B5. The Applicant has also excluded the fields between Orchard Way and Fields SA12, SA13, SA14, SA15, SA26 and SA33 from the Order Limits. Fields SA12, SA13, SA14, SA15, SA26 and SA33 would be used only for the Internal Cable Connection and Internal Access Road.
- 1.5.11. Whilst the Applicant acknowledges that there would be visibility over the Proposed Development from the top of the church tower (if this were accessible) it is the Applicant's view that such views contribute little to the significance of the religious building itself which derives from its architectural interest, historic associations and its prominence in the landscape (none of which would be diminished by the Proposed Development). Any such views would, as Buckinghamshire Council note, contribute to appreciating the parkland, estate farms and historical influence of Claydon House and its owners. Whilst this is an additional potential vantage point from which to appreciate these other assets, the Applicant does not consider that it alters the conclusions of the impacts on them as the contribution that the historic associations and wider landscape make to their significance has already been acknowledged in the individual detailed assessments within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]**

Botolph Claydon Conservation Area

- 1.5.12. The Applicant agrees with the description of the Conservation Area within Buckinghamshire Council's response on this asset. The Applicant has acknowledged the potential for views across the valley from the rear of the properties on the east side of Botyl Road within the individual assessments in **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]**. The prominence of the Conservation Area and its individual buildings is also acknowledged within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]**.
- 1.5.13. The Applicant agrees with Buckinghamshire Council that the Proposed Development will alter the character of the surroundings. The Applicant considers that this would represent a lower level of less than substantial harm than Buckinghamshire Council do. Buckinghamshire Council base their assessment on the percentage of the setting which would change

rather than how this change would affect the heritage significance of the Conservation Area.

- 1.5.14. It is the Applicant's view that, as the character and appearance of Botolph Claydon Conservation Area derives from "a relatively high number of listed buildings" and "a varied building line and a sense of anticipation" resulting from the bends in the road (as detailed within [REP4-090](#)) and that these elements of significance will not be altered, that the harm will be at the lower end of less than substantial and would represent an impact of minor magnitude.

Botolph House

- 1.5.15. The Applicant acknowledges the partially preserved views from the upper floors of Botolph House and that these would have been principal rooms in the 18th century. The Applicant acknowledges that there would be views over the Proposed Development from these rooms but considers that due to the distance (over 950m east to the nearest proposed Solar PV development in Field E23 and 1.5km northeast to the nearest corner of Field E20 which is proposed for the Rosefield Substation – as shown on the **Works Plans [EN010158/APP/2.3.6]**) – and change in elevation to the Proposed Development the impact would be lessened. The expansive view (though partially filtered by existing vegetation) towards Granborough will remain, albeit with new infrastructure visible within it.
- 1.5.16. The Applicant welcomes agreement with Buckinghamshire Council that the magnitude of impact would be minor. As noted above for Claydon House, the Applicant considers that a minor impact (i.e. "slightly compromised" heritage significance) represents a low level of less than substantial harm. The Applicant therefore considers that Buckinghamshire Council have overstated the level of harm and the significance of effect.

East Claydon Village

- 1.5.17. The Applicant concurs with Buckinghamshire Council that East Claydon has early medieval origins, a 13th century church and areas of ridge and furrow earthworks surrounding it which provide evidence of the date of the village and its historic economy (agriculture).
- 1.5.18. The Applicant notes an error in Buckinghamshire Council's assessment where the existing National Grid East Claydon Substation is stated as being "for existing solar power generation". The current substation was constructed in the 1960s as part of the National Grid (**[Ref.1]**); the proposed replacement is stated by National Grid as necessary in part due to network upgrades to facilitate access to electricity from renewable sources and partly due to the age of the existing substation and lack of capacity to connect new customers. Nevertheless, the Applicant agrees

with Buckinghamshire Council that the existing substation has altered the historic setting of the village.

- 1.5.19. The Applicant disputes the weight given by Buckinghamshire Council to the contribution that the prominence of the village and its location on the same ridge as Botolph Claydon makes to its heritage significance. Whilst the Applicant acknowledges that this prominence affords an appreciation of the village from the wider surroundings, it is the Applicant's view that the heritage significance primarily derives from the village's character (noted by Buckinghamshire to have a "sense of enclosure and anticipation with meandering routes through the village").
- 1.5.20. The Applicant has acknowledged that views of the Conservation Area and on the approaches to it will be altered and that this would represent harm at the lower end of less than substantial (i.e. a magnitude of impact of minor adverse).
- 1.5.21. As with Botolph Claydon Conservation Area, Buckinghamshire Council judge the harm to be greater due to the extent of areas where the setting will change. As noted previously, it is the Applicant's view that consideration should be given to how elements of setting contribute to significance and that it is not simply a case that greater change equals greater harm. This is supported by the IEMA/CIFA/IHBC guidance **[Ref. 2]**).
- 1.5.22. The Applicant further disputes Buckinghamshire Council's conclusion of the extent of the areas where the setting of East Claydon would be altered. The Order Limits extend to within 200m of the village only to accommodate below ground cable connections into the Proposed National Grid East Claydon Substation. The nearest above ground elements of the Proposed Development would be the Proposed Rosefield Substation within Field E20 approximately 980m to the east of the village beyond Sion Hill Farm (as shown on the **Works Plans [EN010158/APP/2.3.6]**).
- 1.5.23. It is therefore the Applicant's opinion that Buckinghamshire Council have overstated the harm to significance, magnitude of impact and the significance of effect.

St Mary's Church

- 1.5.24. The Applicant agrees with the description of St Mary's Church provided by Buckinghamshire and has acknowledged the contribution that the prominence of the church makes to its significance within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]**.
- 1.5.25. The Applicant has acknowledged within **Annex D of ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting**

Assessment [EN010158/APP/6.4.4] that the Proposed Development would introduce changes within the setting of the church, including that from vantage points within and in close proximity to the Order Limits, such as on the footpath approaches to East Claydon from the southeast, views of the church would be obscured. Views of the church from further afield (e.g. from higher ground in the east) would not be obscured, but the Applicant acknowledges that the appearance of the fields below the church in these views would alter.

- 1.5.26. The Applicant disputes that the agricultural setting of the church is “unchanged for several centuries”. Although superficially similar to the original 13th century setting of the church in that the surroundings are predominantly agricultural, the original open field system was replaced by enclosed fields in the post-medieval period (including some which were only enclosed in the 19th and 20th centuries – see the plan of the Historic Landscape Character Areas within Annex A of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]**) the now abandoned Aylesbury to Buckingham railway was constructed in the 19th century and the existing National Grid substation and associated overhead pylons were constructed in the 20th century. Buckinghamshire Council themselves state that “the existing substation and associated infrastructure have already eroded the setting from some vantage points” (page 10 of REP4-090)].
- 1.5.27. The Applicant further disputes Buckinghamshire Council’s position on the contribution that the agricultural land use of its setting makes to the significance of the religious building. Even if this position were accepted, the fields closest to the church are either outwith the Order Limits or would be used for below ground cabling to connect to the Proposed National Grid East Claydon Substation and would therefore retain an agricultural appearance. The closest above ground elements of the Proposed Development would be over 900m to the southeast within Field E22 (proposed for Solar PV) and over 950m to the nearest corner of Field E20 which is proposed for the Rosefield Substation (as shown on the **Works Plans [EN010158/APP/2.3.6]**).
- 1.5.28. As such the Applicant considers that the significance of the church would only be slightly compromised by the presence of the Proposed Development within this wider agricultural setting – this impact arising from the obstructed views of the church tower which would diminish the contribution that its prominence makes to its significance.
- 1.5.29. The Applicant therefore maintains that the Proposed Development will result in a negligible impact on the significance of the church (representing a very low level of less than substantial harm) and that the effect would be slight.

Rosehill Farmhouse and outbuildings

- 1.5.30. The Applicant welcomes the additional description of the farmhouse and outbuildings and agrees that views from the Addison Road bridge (approximately **Viewpoint 39** illustrated in **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]** afford an opportunity to appreciate Rosehill Farmhouse and its associated outbuildings within their agricultural surroundings. The Applicant concurs that Claydon House is within this view although the stone dressed east elevation of Rosehill Farmhouse which provides a visual indicator of their historic connection is not visible from this direction.
- 1.5.31. The Applicant acknowledges within Annex D of **ES Volume 4, Appendix 9.1: Archaeological Desk-Based Assessment and Setting Assessment [EN010158/APP/6.4.4]** that the change to the wider agricultural surroundings will result in some harm to the significance of Rosehill Farmhouse, but maintains that this would be at the very lower end of less than substantial (an impact of negligible magnitude) due to the distance to the Solar PV modules in Parcel 1. There would be only distant filtered views of the Proposed Development from Rosehill Farmhouse and the areas where it is appreciated, and the historic relationship between Rosehill Farmhouse and Claydon House (both visually and conceptually) would not be severed.
- 1.5.32. The Applicant disputes that the farm would become “isolated” as the physical and visual relationship with Claydon House and Blackmoorhill Farmhouse will remain unchanged. The Applicant acknowledges that the loss of Shepherd’s Furze Farmhouse and the construction of HS2 and the replacement road bridge over East West Rail (previously the Oxford and Bletchley Branch of the L&NW Railway) have altered the setting of Rosehill Farmhouse to the west and northwest.
- 1.5.33. The Applicant considers that Buckinghamshire Council have overstated the level of harm to the significance of Rosehill Farmhouse which would occur as a result of the Proposed Development. This is largely due to Buckinghamshire Council presenting their position on the cumulative effects with HS2 and East West Rail.
- 1.5.34. The Applicant considers that as East West Rail utilises a historic railway corridor the effect of any severance between Rosehill Farmhouse and the surrounding landscape would be negligible. The Applicant acknowledges that the demolition of Shepherd’s Furze Farmhouse has altered the setting of Rosehill Farmhouse, but this now forms part of the baseline of how the setting of Rosehill Farmhouse contributes to its significance. The Proposed Development lies over 680m to the south of Rosehill Farmhouse and whilst it will surround Pond Farmhouse (another estate farm) no further demolition would occur and the pattern of estate farms will be

retained as it is presently. The Applicant considers that other elements of HS2 are sufficiently distant (over 1km to the southwest) to not result in severance and would not result in cumulative harm to the listed building.

Blackmoorhill Farmhouse

- 1.5.35. As with Rosehill Farmhouse above, the Applicant welcomes the additional description of Blackmoorhill Farmhouse.
- 1.5.36. The Applicant disputes that Solar PV modules would be “a noticeable presence on the approaches to Blackmoorhill Farmhouse from the south west and west”. The Applicant has proposed mitigation along Orchard Way/Calvert Road in the form of increased hedgerow heights and infilling of gaps to screen the Solar PV development from view when travelling along the road. This will serve to minimise any visibility on the approaches to Blackmoorhill Farmhouse.
- 1.5.37. The Applicant and Buckinghamshire Council do not agree on the significance of effect, which is a matter of professional judgement when applying the EIA matrix. However, the Applicant and Buckinghamshire Council are in agreement that the harm to significance would be at the lower end of less than substantial.

Pond Farmhouse

- 1.5.38. The Applicant and Buckinghamshire Council both agree that the harm to the significance of Pond Farmhouse resulting from the severance from its agricultural land would represent less than substantial harm. The Applicant's professional judgement is that this would be within the middle of the scale (representing an adverse impact of moderate magnitude – i.e. that the significance would be compromised but not severely so), whilst Buckinghamshire Council consider the harm to be at this greater level.
- 1.5.39. In line with the CIFA/IHBC/IEMA Principles of Cultural Heritage Impact Assessment [**Ref. 2**] the Applicant considers all elements of significance (i.e. the sum total of the heritage values ascribed to an asset) when considering the assessment of impacts / harm. As the listed building derives the majority of its significance, and its principal reason for designation, from the inherent historic and architectural interest of its fabric (which will not be altered by the Proposed Development), the Applicant maintains that the significance would not be severely compromised by the Proposed Development which will result in changes to the setting only.

Bernwood House

- 1.5.40. The Applicant acknowledges that this asset is currently being considered by Buckinghamshire Council as a candidate for local listing. Locally listed

buildings are non-designated heritage assets (NHDAs) as defined in Historic England Advice Note 7 (Third Edition) **[Ref. 3]**.

- 1.5.41. The Applicant and Buckinghamshire Council are in agreement that the importance of this non-designated heritage asset is low.
- 1.5.42. The Applicant and Buckinghamshire Council are also in agreement that the magnitude of impact on Bernwood House would be moderate (albeit Buckinghamshire Council's view is that this would be close to major), that is that the heritage significance would be compromised. The Applicant considers that this would represent harm within the middle of the scale of less than substantial whilst Buckinghamshire Council consider that the harm would be nearer the top end of this scale, approaching substantial harm. The Applicant and Buckinghamshire Council are in agreement that the effect would be Slight Adverse and not significant.

References

- Ref. 1** National Grid East Claydon replacement substation project website. Available at <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-claydon-substation> Accessed 15 July 2026
- Ref. 2** IEMA/CIFA/IHBC (2021) Principles of Cultural Heritage Impact Assessment in the UK Available online at: https://www.archaeologists.net/sites/default/files/2024-11/CIfA-IEMA-Principles-Cultural-Heritage-Impact-UK_2021.pdf Accessed 15 July 2025
- Ref. 3** Historic England (2026) Local Heritage Listing: Identifying and Conserving Local Heritage Historic England Advice Note 7 (Third Edition). Available online at <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing-2026/> Accessed 13 July 2026

Appendix 2

Biosecurity Response Table



Biosecurity Explanatory Note

1.1. Introduction

- 1.1.1. This note has been prepared by the Applicant to provide an overview of the progression of its proposed biosecurity controls in relation to the concerns raised by Preston Farms Limited and TCS Biosciences Limited (PFL/TCS).
- 1.1.2. The Applicant submitted the **Preliminary Biosecurity Statement [EN010158/APP/8.28] [REP4-086]** at Deadline 4. This statement set out the Applicant's initial approach to biosecurity measures and expressly identified that the measures it contained were a starting point for further development.
- 1.1.3. The Applicant has now submitted the **Outline Biosecurity Management Plan (Outline BMP) [EN010158/APP/8.39]** at Deadline 5. This has been created in light of various matters, including:
- Measures listed in the PFL/TCS response to ISH1 Action Point 37, which is contained at paragraph 33 of their **Deadline 4 Submission [REP4-104]**;
 - Submissions made by PFL/TCS during Issue Specific Hearing 3 and Compulsory Acquisition Hearing 2, held between 7 and 9 July 2026; and
 - Prior and subsequent engagement with PFL/TCS.
- 1.1.4. The **Outline BMP [EN010158/APP/8.39]** supersedes the Preliminary Biosecurity Statement and is a stand-alone control document which establishes the minimum outcomes, controls and governance arrangements to be carried forward into the detailed Biosecurity Management Plan.
- 1.1.5. It is proposed that the detailed Biosecurity Management Plan will be approved by the Secretary of State under Requirement [20] of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.8]** before the relevant construction activities within the Biosecurity Area can commence. It must be prepared following consultation with PFL/TCS, and the discharge application must include a consultation log and an explanation of how PFL/TCS's reasonable comments have been taken into account. The **Outline BMP [EN010158/APP/8.39]** also provides for corresponding operational and decommissioning controls, an Independent Veterinary Adviser (IVA) where required, phase- or part- specific Biosecurity Interface and Zoning Plans within the Biosecurity Area shown on the **Biosecurity**

Area Plan [EN010158/APP/2.7], animal-crossing procedures, incident response, monitoring, records and review mechanisms.

- 1.1.6. The **Outline BMP [EN010158/APP/8.39]** responds substantively to all 25 measures requested by PFL/TCS. Several are incorporated directly and the remainder are addressed through equivalent, alternative or proportionate controls. The physically separated and controlled access arrangement removes or materially reduces several interfaces that the requested measures sought to manage, so those measures are not required in the precise form proposed. The remaining qualifications concern proportionality and the appropriate allocation of approval and operational decision-making responsibilities.
- 1.1.7. The detailed Biosecurity Management Plan will need to provide the necessary additional level of detail in accordance with the **Outline BMP [EN010158/APP/8.39]** and in consultation with PFL/TCS.
- 1.1.8. A summary of how the Applicant has substantively addressed each of the measures set out by PFL/TCS is set out in **Table 1** below. All paragraph references listed refer to the **Outline BMP [EN010158/APP/8.39]**.

Table 1: Applicant's response to biosecurity measures requested by PFL/TCS

Reference	Applicant's response
	Escorted access
a)	– An escort is required for preliminary site-establishment works, exceptional access onto PFL/TCS land and operational cable access outside the separate access area. – Routine access within a physically separated Applicant Controlled Area does not require an escort. – This is secured in sections 2.2 and 2.4 and paragraph 3.1.4 of the Outline BMP [EN010158/APP/8.39].
	Enhanced controls for certain access
b)	– Enhanced controls in unescorted areas include named-person access, pre-induction training, registration, hygiene measure and Animal Crossing Point controls. – This is secured in sections 2.3 and 2.5 to 2.10, and paragraphs 3.1.3 to 3.1.7 of the Outline BMP [EN010158/APP/8.39].
	PFL/TCS-specific induction and training
c)	– Role-based induction will include appropriate training on the Animals (Scientific Procedures) Act 1986 and Home Office

Reference	Applicant's response
	context, the Named Veterinary Surgeon, welfare oversight, donor-animal sensitivity, prohibited conduct, reporting and non-compliance. – Key trainers receive direct PFL/TCS training, at the Applicant's cost. – This is secured in paragraphs 2.5.1 to 2.5.3 and Appendix D of the Outline BMP [EN010158/APP/8.39].
d)	Exceed generic site inductions – See above. – Training is separately recorded, refreshed and repeated for replacement personnel and relevant contractors, while tailored briefings apply to visitors and delivery drivers. – This is secured in paragraphs 2.5.3 and 2.5.4 of the Outline BMP [EN010158/APP/8.39].
e)	Named-person access only – Access is restricted to named, inducted and authorised persons and is controlled through logging and defined permissions, rather than repeated visit-by-visit authorisation. – Individual Non-Disclosure Agreements (NDAs) apply where access to confidential information justifies them. – This is secured in paragraphs 2.3.1, 2.3.5 and 2.6.2 of the Outline BMP [EN010158/APP/8.39].
f)	Pre-arranged, logged and authorised access – Logging, photo identification, visible time-limited permissions and defined permitted areas are secured. – Operational access is pre-arranged, while construction access requires induction before the first visit and logging on each visit. – This is secured in paragraphs 2.3.2 to 2.3.5 and 3.1.3 of the Outline BMP [EN010158/APP/8.39].
g)	Live access register – A live register will record the identity, employer, role, induction, time, vehicle, route and purpose of entrants. – This is secured in paragraph 2.3.2 of the Outline BMP [EN010158/APP/8.39].

Reference	Applicant's response
	Movement controls at PFL/TCS interface h) – Construction access and Animal Crossing Points are controlled by gates and banksmen, while operational gates are locked and access-controlled. – A camera will be considered where reasonably requested. – This is secured in paragraphs 2.3.2, 2.10.2, 3.1.3, 3.1.6 and Appendix B of the Outline BMP [EN010158/APP/8.39].
	Background screening i) – Identity, right-to-work and competence checks are required, with provision for additional lawful and role-based controls where justified. – Routine DBS checks are not required for the roles and access arrangements proposed. – This is secured in paragraph 2.6.1 of the Outline BMP [EN010158/APP/8.39].
	No unnecessary access across PFL/TCS land j) – Movement is confined to the defined route, and entry onto PFL/TCS land is permitted only for exceptional, pre-arranged escorted access. – This is secured in sections 2.3 and 2.4, paragraph 2.5.7 and paragraph 3.1.4 of the Outline BMP [EN010158/APP/8.39].
	Pre-entry hygiene controls k) – Access is refused until mandatory hygiene controls are met. – Vehicles accessing Parcel 3 will use wheel dips where reasonably practicable, with wheel and wheel-arch spraying as the alternative. Wheel-disinfection arrangements will be provided on both sides of any Animal Crossing Point, with disinfection applied before entry only. – This is secured in paragraph 2.7.2, section 2.8 and paragraph 3.1.6 of the Outline BMP [EN010158/APP/8.39].
	Pre-access declarations l) – Personnel must report relevant external livestock contact, farm visits, disease restrictions and contamination events.

Reference	Applicant's response
	– Vehicle risk is controlled through the wheel dip or alternative spray arrangements for Parcel 3 and other risk-based controls, rather than a history declaration for every vehicle. – This is secured in paragraph 2.7.4 and paragraphs 2.8.1 to 2.8.4 of the Outline BMP [EN010158/APP/8.39].
m)	Separated routes – The access route is physically separated. Personnel may not enter livestock, feed, water, handling or other internal PFL/TCS areas, and dust controls further reduce transfer risk. – This is secured in section 1.8, sections 2.2 to 2.4 and section 2.9 of the Outline BMP [EN010158/APP/8.39].
n)	Fixed routes – Access is restricted to defined routes, and any departure from the designated route is a reportable incident. – This is secured in paragraphs 2.3.2 and 2.5.7, paragraph 5.3.1 and Appendix C of the Outline BMP [EN010158/APP/8.39].
o)	Vehicle, equipment, clothing and footwear controls – The Outline BMP [EN010158/APP/8.39] secures cleaning, disinfection, spot checks, records and refusal of access, with measures selected having regard to the activity. – This is secured in sections 2.7 and 2.8, section 5.1 and section 6.2 of the Outline BMP [EN010158/APP/8.39].
p)	Photography, filming and drone restrictions – These activities are prohibited over PFL/TCS operational areas except for legitimate project purposes agreed with PFL/TCS. – This is secured in paragraphs 2.5.7 and 2.5.8 and paragraph 3.1.7 of the Outline BMP [EN010158/APP/8.39].
q)	No-contact rules – Contact with animals and interference with gates, fencing or farm equipment are prohibited, and personnel may not enter PFL/TCS internal facilities. – This is secured in paragraph 2.4.5, paragraph 2.5.7 and Appendix D of the Outline BMP [EN010158/APP/8.39].

Reference	Applicant's response
r)	Escort requirements in sensitive areas – See above. – An escort applies where personnel enter PFL/TCS land and for operational cable access beyond the separated area. – Routine escort within a secured Applicant Controlled Area is unnecessary because the relevant interface has been physically removed. – This is secured in section 2.4 and paragraph 3.1.4 of the Outline BMP [EN010158/APP/8.39].
s)	Works blackout periods – Works and vehicle movements pause for pre-notified animal movements and other sensitive events agreed through liaison, with enhanced controls during disease-risk periods. – This provides targeted protection without conferring a unilateral power to impose wider blackout periods. – This is secured in section 2.1, paragraph 2.11.1, section 2.12 and paragraph 6.1.2 of the Outline BMP [EN010158/APP/8.39].
t)	Specific environmental controls – Noise monitoring and mitigation, dust controls and consideration of additional trigger, action or behavioural-response levels are secured where this relates to biosecurity. – The detailed controls will reflect the assessed effects, the location of animals and whether the relevant interface remains. – This is secured in section 1.5, section 2.9 and paragraph 2.11.2 of the Outline BMP [EN010158/APP/8.39].
u)	Stop, review or modify powers – The affected activity is made safe and paused where works may be causing injury, significant distress or an immediate continuing risk. – Specialist veterinary advice informs the response and restart decision without creating a general stop-work or restart veto. – This is secured in paragraph 1.7.5, paragraph 2.11.3 and paragraphs 5.3.2 to 5.4.2 of the Outline BMP [EN010158/APP/8.39].

Reference	Applicant's response
v)	Independent protection and compliance oversight – A funded Independent Veterinary Adviser may monitor, inspect, audit, require records, investigate and escalate where construction coincides with the relevant grazing interface. – The role is independent and proportionate to the actual interface. – This is secured in paragraphs 1.7.1 to 1.7.4, paragraph 5.1.3 and paragraph 5.4.1 of the Outline BMP [EN010158/APP/8.39].
w)	Reporting requirements. – Breaches affecting the interface are reported promptly, and serious incidents are reported immediately. – Other concerns are recorded, acknowledged and addressed within a timescale proportionate to their nature and urgency. – This is secured in paragraph 5.2.1 and paragraphs 5.3.1 to 5.3.4 of the Outline BMP [EN010158/APP/8.39].
x)	Incident and product protocol – Comprehensive incident and investigation procedures cover contamination, unauthorised access, injury, escape, welfare, product quality and continuity, investigation, corrective action and remediation, with urgent liaison where a potential product impact is alleged. – This is secured in section 5.3, paragraph 5.4.3, paragraph 6.1.2 and Appendix C of the Outline BMP [EN010158/APP/8.39].
y)	Audit trail and record retention for certain activities and decisions – Relevant record keeping will be comprehensive and disclosure will be proportionate. – Relevant implementation, access, training, hygiene, incident and corrective-action records are retained and made available on justified request, subject to legal, personal-data, security and confidentiality requirements. – This is secured in section 2.3, paragraph 2.5.3, paragraph 2.8.4, sections 5.3 to 5.4 and section 6.2 of the Outline BMP [EN010158/APP/8.39].



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