Rosefield Solar Farm (EN010158)

Buckinghamshire Council's ISH3 Post Hearing Note

Buckinghamshire Council

July 2026

Buckinghamshire Council's ISH3 Post Hearing Note

Introduction

1. In line with the Examination Timetable, Buckinghamshire Council (**the Council**) provides the following information and submissions following Issue Specific Hearing 3 held on 7 and 8 July 2026 (**ISH3**). This note records the submissions made by counsel for the Council (Mr Daniel Kozelko), the experts that made submissions in support of the Council (that are referred to at the relevant points in this note), and Councillor Collingwood as Chair of the Strategic Sites Planning Committee for the Council.

Item 1: Introductions, arrangements and purpose of the hearing

2. Mr Kozelko introduced himself as counsel to the Council, instructed by Buckinghamshire Legal Services. He also introduced Ms Zenab Hearn as Strategic Technical (Majors) at the Council and Cllr Alex Collingwood as Chair of the Strategic Sites Planning Committee at the Council. Mr Kozelko informed the Examining Authority (**ExA**) that he would introduce the relevant technical experts under each Agenda Item.

3. Mr Kozelko highlighted to the ExA that the Council had some availability limitations. He flagged that the Council's experts on Noise and Soils were not available. He also highlighted that the Council's expert on Population and Health was not available at the end of Day 1 and requested that both issues be addressed at the start of Day 2. He noted that this appeared to align with the timing intended by the ExA that Items 1 to 7 be addressed on Day 1. The ExA accepted that request, and Item 12 was moved up the Agenda.

4. Mr Kozelko also highlighted that a number of Councillors from the Council were present in the room to state their position on behalf of their constituents, but that he along with the individuals that he introduced represented the institutional position of the Council.

Item 2: Need, site selection and alternatives

Item 2(a): Output of the proposed development and related land take

5. The Council made limited submissions under this heading. Following a discussion on the issue of overplanting, and AP1 on the issue being directed to the Applicant, Mr Kozelko highlighted that there was relevant case law on overplanting that the Applicant should address when considering the issue. Mr Kozelko emphasised that the point was raised neutrally simply as this had been an issue that had tripped up other schemes in the past.

6. ***Post Hearing Comment:*** the relevant case law is *R (Galloway) v Durham CC* [2024] EWHC 367 (Admin) and *Ross v Secretary of State for Housing, Communities and Local Government* [2025] EWHC 1183 (Admin). Both cases commented on the proper approach to the issue of overplanting and how it is addressed in the context of NPS EN-1 and NPS EN-3. They are identified in AP1.

Item 2(b): The need for the BESS in relation to NPS EN-1 para 3.2.6

7. Following submissions by the Applicant on the proper interpretation of NPS EN-1 para 3.2.6, Mr Kozelko made submissions. He highlighted that the specific issue that the Council was addressing was a narrow one which arose out of submissions at ISH1 by CSAG whereby they challenged the need case for the BESS. At that time, the Applicant's expert in response referred to para 3.2.6 and stated that the need case was set by the NPS.

8. Mr Kozelko emphasised that the Council did not dispute that NPS EN-1 set out a positive policy position in favour of BESS. However, the point he was making is that an applicant cannot rely on the NPS to determine the need position per se for BESS. That is in contrast to solar PV: were a party to sit around the Examination table and argue that there was no need for ground-mounted, large scale PV in the UK, the Applicant would correctly direct the ExA to s.104 of the Planning Act 2008 (**PA 2008**) and ask the ExA to disregard the submission. That is because the NPS sets the need case for solar PV at the policy level.

9. Thus, Mr Kozelko explained that the narrow point being made was that associated development such as BESS does not come under the scope of the PA 2008 on its own terms (pursuant to ss.14 and 15 PA 2008), and that a need position for it is not

established per se by the NPS. Mr Kozelko flagged that there was a danger of the issue being blown out of proportion into a general argument about policy support for BESS.

10. ***Post Hearing Comment:*** *as highlighted above, this is a narrow point. However, it does make a difference to how to approach the need for BESS in policy terms. The Applicant referenced various paragraphs in the NPS and stated that there is policy support for BESS in NPS EN-1; the Council does not dispute this. However, what para 3.2.6 of NPS EN-1 specifically does is set a determined need position for the principal development within the scope of the policy.*

11. *The principal scope of the policy is defined in para 1.3.4 (as cross-referred to by para 1.1.1). As would be expected, it identifies those developments falling within ss.14-21 PA 2008 as the "Energy" infrastructure covered by the Nationally Significant Infrastructure Project (**NSIP**) regime. Exempt electricity storage facilities are specifically excluded from s.14 PA 2008 and thus the NSIP regime directly, and can only appear within the regime as associated infrastructure. Being specifically excluded, they are not descriptions of development for Part 1 PA 2008 for which the need can be set under s.5(5). The need that can be irrefutably set by the Act is the need for the forms of development within the scope of the PA 2008.*

12. *It is, of course, correct that BESS can be associated development. It is also correct that NPS EN-1 provides the relevant policy for decision-making on the associated development (per para 1.3.12), and supportive policy is in the NPS. However, that is parasitic on the principal development (indeed, necessarily so as BESS alone is not within the scope of the Act or the NPS). That may be contrasted with para 1.3.7 which provides "[i]n addition to the above specific categories of NSIP, section 35 of the Planning Act 2008" is included (which is the power to direct that development should be treated as development for which Planning Act 2008 consent is required). It may include, then, descriptions of development which are described in the Planning Act 2008 and the NPS save for (for example) that the capacity limit is not met (e.g. 100MW currently for solar PV). That is different to development reliant on itself being "associated" with the principal development. Thus the setting of the need case as part of s.5 PA 2008, and the effect of para 3.2.6, is specifically directed to the principal*

development that is the focus of the NPS, it is not setting the need case for associated development.

13. Following a discussion of the Statkraft Greener Grid Park that was recently consented near East Claydon Substation, an Action Point was given to the Council to provide relevant application documents related to that application.

14. **Post Hearing Comment:** relevant documentation related to that application, which now has a resolution to grant consent, is provided with this Post Hearing Note to meet AP3.

15. Following a further discussion of the need case for the BESS, Mr Kozelko introduced Councillor Collingwood who spoke to the consenting process for the Statkraft Greener Grid Park. This included explaining that the committee discussion went to 5 hours, and that they looked at the Park in the context of the adjacent and potentially proposed substation. He noted that what this created was a battery cluster around the substation rather than the BESS being placed out in the countryside such as in the Proposed Development. He explained that the Councillors on the Committee went on to site and examined how it was located and considered it produced an appropriately placed node away from the Aylesbury Vale Area of Attractive Landscape. He considered that the use of the consented BESS at that location should have been taken into account as part of the Proposed Development.

16. The ExA asked the Council its current position on the location of the BESS in light of the provision of further evidence by the Applicant at the preceding deadline. The Council accepted that the new evidence, and particularly the area of land needed for the BESS, was not available in E10 and E11 given the existing constraints. Thus, specifically on the information provided (and that there was said to only be around 15% of the necessary space required) the Council accepted that the location was not feasible. Mr Kozelko did, however, emphasise that this did not change the Council's position on the acceptability of the Proposed Development or the acceptability of the BESS in D8 and D9.

17. In respect of co-location, Mr Kozelko referred to the Applicant's position that it was not providing for overplanting within the present parameters for the Proposed

Development, and highlighted that this changed the relationship of the BESS with the solar PV. He pointed to para 3.3.6 of NPS EN-1 and noted that, as a result, this would not give rise to the same clipping issue (whereby overproduction of a scheme beyond export capacity meant that energy was wasted).

18. ***Post Hearing Comment:*** *the Applicant disputed this position. The Council disagrees and its position is that a lack of overplanting changes the relationship to and need for the BESS (i.e. it is not needed to manage overgenerarion as against the grid connection). In any event, insofar as the Applicant relies upon oversupply in the national network, the Council remains concerned about the relationship of the Proposed Development to the 1GW of local BESS storage in such an oversupply situation, and the capacity for any oversupply to be absorbed locally. Insofar as the Applicant argues that this cannot be done 'in front of the meter', the Council considers providing for such oversupply behind the meter was an appropriate alternative case to consider (given the duties in the EIA Regulations). That is particularly so given the concerns that the Council has about the location of the proposed BESS.*

<u>Item 3: Ecology and biodiversity</u>

Item 3(a): Bechstein's Bats

19. Mr Kozelko highlighted that the Council had been informed informally that progress had occurred between the Applicant and Natural England (**NE**) on the issue of Bechstein's Bats. Mr Kozelko raised the concern that the Council, as the Local Planning Authority and as the body that would ultimately discharge many of the requirements in the DCO, had not been provided the information prior to ISH3 and had not been involved in those discussions. He expressed the Council's disappointment that it had been excluded from those substantive discussions and, given the role the Council plays on the outline plans secured in the DCO, considered that early sight of the proposals would be particularly important.

20. He also highlighted that NE had said to the Council that it would not discuss the proposals because of commercial sensitivity. Mr Kozelko explained that bilateral discussions with NE did not stop the Applicant engaging with the Council, and that a draft could be provided to the Council while matters were still pending. Mr Kozelko

highlighted that the Council did not consider that a meeting shortly before ISH3 had been directed to the issue of bats, and that the information that it was provided was limited.

21. As a result, Mr Kozelko confirmed that the Council was not in a position to comment due to the lack of information. He also confirmed that removals that the Council considered appropriate extended to B10 and B11, and also D28 and D29 which were not part of the NE discussions with the Applicant. Mr Kozelko confirmed that the Council was always open to reconsidering its position in response to new evidence, but that it would not change its position on the basis of an oral summary without the requisite information. Mr Kozelko emphasised that discussions with NE do not stop the Applicant also discussing the issue with the Council.

22. ***Post-Hearing Note:*** *as is explained in the other submissions that the Council has produced for Deadline 5, while the Council has had the proposals presented to it, it has not been provided with the documents and the details required to actually engage with these issues and provide a considered and measured position for the ExA. Given the urgency that the ExA identified in ISH3 that such information be provided, the Council is disappointed by this (especially noting that the Applicant has not at the time of writing taken up the ExA's invitation to submit the proposals early to the Examination).*

23. On the issue of temporary construction compounds, Mr Kozelko introduced the Council's expert on bats Ms Annie Ottaway. She reiterated the point made by CSAG about the placement of the relevant compound and whether flexibility in its location could be reduced so that it could be moved away from hedgerows that will be used by bats. While she welcomed removals proposed in discussion with NE she highlighted that she had no understanding of what this might involve and therefore could not comment further.

24. On the issue of the bat monitoring strategy, Ms Ottaway explained that she welcomed the update to the Outline LEMP and the strong baseline to be provided with monitoring, but noted that further updates are to be introduced following the discussions between the Applicant and NE. She flagged that the Council's concerns remain on the issue of remedial measures. In particular, she had concerns, as an

example, about how reactive remedial measures would operate if it is identified that the buffers are not sufficient.

25. Following CSAG asking whether the Outline LEMP would include a provision for the removal of solar PV from the site as a remedial measure, the Applicant said that it was not its case that this should be explicit in the plans and it was not proposing it (but also that the plans do not prevent it). Mr Kozelko highlighted that the ExA need to be aware of what is the outer edge of the envelope for what it is consenting, and that the ExA could not be left uncertain about the maximum remedial measures that could be provided for. The Applicant emphasised the list of remedial measures was an open one, and as a result the Council emphasised its understanding that this would mean removals could be required if it was necessary. In doing so, it accepted that it was not necessary to list every possible remedial measure, but this clearly was a point for clarification. The Applicant confirmed that "I would [say] it's in scope because it's not out of scope".

Item 3(b): Buffers

26. On the issue of buffers, Ms Ottaway confirmed that there remained a dispute on the proper buffering to be provided to ancient woodland. Ms Ottaway confirmed that the Council still sought the 50 meters which appeared in Policy NE8 of the Vale of Aylesbury Local Plan. The Applicant confirmed that it proposed 30 meters. Both sides agreed that this was a matter of professional disagreement.

27. Turning to the issue of buffers on hedgerow, Ms Ottaway confirmed that it remained baffling to the Council that the buffer would be measured from the centreline of the hedgerow when the buffer was intended to protect the ecological feature. The normal approach in such circumstances would be to measure from the outer edge to ensure that the buffer was effective. In respect of root protection areas the Council identified that there were some locations where proposed fencing appeared to fall within those areas. The Council accepted that a design commitment not to encroach upon such areas was welcome, but this highlighted the underlying issue with such an approach to hedgerow buffers.

Item 3(c): Hedgerow removal

28. As to the issue of hedgerow removals, Ms Ottaway maintained the Council's view that the removal of over 2km of hedgerow would result in the fragmentation of ecological networks in the Bernwood Opportunity Area. That was particularly in light of the long-term recognition of the particular ecological importance of connectivity in that area. Applying the mitigation hierarchy, Ms Ottaway stated that there was not sufficient consideration of avoidance here, and that the removals of hedgerow linking up the ancient woodlands was going to have an impact on overall ecological connectivity.

29. Ms Ottaway did explain that the Council was not disputing the mitigation and compensation being provided for the loss of connectivity. However, this still did not involve sufficient consideration of avoidance in an area that is particularly ecologically sensitive.

Item 3(d): Ground nesting birds

30. Mr Kozelko introduced Mr Paul Holton who made submissions for the Council on this issue. He explained that the proposed compensation areas for ground nesting birds currently had a multifunctional purpose within the Proposed Development. For example, in respect of birds they also provided functionality for Bechstein's Bats. Mr Holton identified that the concern is drilling down into what management prescriptions are going to be imposed on the site to ensure no conflict between those uses. For example, if grazing of livestock were secured that would conflict with a ground nesting bird use.

31. On the monitoring side, Mr Holton raised the concern that any monitoring needs to be robust and capable of identifying trends in respect of ground nesting birds rather than isolated observations. This was to operate alongside the remedial measures to ensure that there is not that conflict and that the compensation is effective. He wishes to ensure that ultimately measures adopted for one ecological receptor should not undermine the other.

32. As to topography, Mr Holton identified that there was a concern about the existing population of ground nesting birds on sites with elevations in topography. Thus, the concern is whether the Applicant can in fact demonstrates that the fields identified have the requisite carrying capacity for the remedial measures to operate in place.

33. Following submissions from the Applicant, the Council again confirmed that it looked forward to seeing the further detailed proposals and that a position was reserved to comment upon this. In that regard, and any residual concerns the Council may have, it was noted that the Applicant as AP5 was required to produce a position paper on ground nesting and wintering birds in the context of relevant populations.

34. ***Post Hearing Comment:*** *the Council has now had sight of a paper on ground nesting birds provided to it on 23 July 2026. As a result of expert availability, the Council has not yet had the opportunity to review this document, and as a result will provide comment at the next deadline (along with the other outstanding ecological matters).*

*Item 3(e): Biodiversity net gain (**BNG**)*

35. Mr Kozelko introduced Ms Ottaway to address BNG. She noted the productive meetings on this issue that have occurred between the Applicant and the Council. She explained that the submission at Deadline 4 had addressed some but not all of the concerns that the Council identified.

36. First, Ms Ottaway highlighted a remaining concern with overlap with HS2 mitigation and asked for confirmation about how this was mapped and calculated. She asked for an evidential chain to address this.

37. Second, it was noted that the Applicant proposed to introduce lowland meadow. Ms Ottaway explained that the Council welcomed this, but noted that changes would need to be made to the metric to reflect the delay in securing that habitat.

38. Third, a concern was raised about the proper approach to mapping habitat area around lines mapped on hedgerows. Ms Ottaway relied upon page 26 of the Statutory Biodiversity Metric User Guide that the whole of the site must be assigned an area habitat up to the hedgerow centreline. It was considered that the Applicant's approach using the Priority Habitat Definition erred as the width included in the hedgerow mapping meant an area was not mapped. Ms Ottaway explained this was not an issue with the underlying UK Habitats definition, but rather a failure to use the Statutory Metric Guide.

39. ***Post Hearing Comment:*** *on the first two issues the Council await further information at the next Deadline but welcome the suggestion that these issues will be addressed. In respect of the issue of mapping: the Council was sent a Position Paper on Arable Field Margins and BNG Assessment (July 2026) which has stated that the BNG assessment will be updated at deadline 5 to map all arable field margins. This will be commented upon once the assessment is updated.*

Item 4: Landscape and visual (including good design)

Item 4(a): Design commitments

40. In respect of the provisions in the design commitments addressing colour, Mr Kozelko confirmed that further clarification on colour choices and a study to support that so that a baseline for the Applicant and the Council would be welcome. That was not a formal colour study per se, but information that the Applicant would obtain beforehand. This was noted in the context of the picking of the colours, for example, for the acoustic fence. However, Mr Kozelko confirmed that the Council was broadly supportive of the Design Commitments.

41. Mr Kozelko then introduced Mr Neil Hutchins who explained that it is important to have the local colour palette and local vernacular in mind when designing mitigation, for example with acoustic fencing, mitigation fencing, or other structures that are part of a scheme. He explained that every area is unique and there will be unique properties in this area here. As a result, he confirmed that it would assist the Council to have that information related to a study and study findings.

42. Following questions from the ExA, Mr Kozelko confirmed that the Council was not seeking information now. Rather, the Council was seeking a wording in the Design Commitments or one of the outline plans to secure some form of baseline information for colour and vernacular so that could be taken forwards in detailed design.

43. After the Applicant flagged that some elements in the Design Commitments had colours specified, Mr Kozelko explained that specification of a colour does not answer the question of variations in that colour (such as in relation to hue). AP7 (and AP8 in relation to CSAG) were made in relation to this issue.

44. ***Post Hearing Comment:*** *pursuant to the Action Point, the Council has provided a wording which addresses the issues identified at the hearing. As was noted at the hearing, even where colour is specified for an element there are still factors to take into account in identifying (for example) hue. In addition, the Design Commitments identify the taking into account of local building styles and sensitivity to local environment. For the Applicant's consideration, the following wording was submitted in advance of Deadline 5 as a suggested new paragraph 2.1.2 to the Design Commitments (such wording arising out of further discussions with CSAG concerning their Action Point):*

> *"2.1.2 Where these Design Commitments refer to the colour of an element of the Proposed Development, refer to an element being rendered to suit local building styles, or refer to an element being sensitive to the local environment, any detailed design and detailed design approval in respect of that element will be informed by a proportionate study undertaken by the Applicant in accordance with the Environmental Colour Assessment guidance issued by the Landscape Institute (in TIN 4/2018) to establish the local baseline for the colour palette."*

Item 4(b): LVIA methodology and conclusions

45. In respect of the LVIA methodology and conclusions, Mr Kozelko confirmed that the Council and Applicant remained in professional disagreement. Mr Kozelko highlighted that the approach the Council espoused was one which had been adopted in other DCOs and at the local planning level. Mr Hutchins added that there were concerns in the application of the LVIA methodology but ultimately this had come to an agreement to disagree.

46. Mr Kozelko then introduced Councillor Collingwood to speak to this issue. He highlighted his concern about the amount of countryside impacted upon by the Proposed Development, particularly given his recent site visits related to other developments in the area. He highlighted views that raised concerns for him, and also referred to the Regulation 19 Local Plan being advanced by the Council and how that dealt with the designation proposals for the Area of Attractive Landscape. Councillor Collingwood expressed concerns about how this, along with the Bernwood Jubilee

Way and other locations, were affected. He also highlighted the significant amount of large infrastructure being built in the area (including HS2 and East West Rail), and the overall cumulative effect.

47. The Council was asked as AP9 to provide details about the draft Local Plan in respect of the Quainton-Wing Hills Area of Attractive Landscape and the associated timescales for the adoption of the updated plan. Mr Kozelko confirmed that this could be provided.

48. ***Post Hearing Comment:*** *with this submission the Council provide the relevant documents concerning the Reg 19 Local Plan. The Reg 19 Local Plan was published on 23 July 2026 and consultation runs until 6 September 2026. Following consultation, the Council intends to submit the Plan for examination. The draft Plan includes the proposed Quainton-Wing Hills Area of Attractive Landscape designation, which reflects the Council's assessment of the landscape value and sensitivity of the area. While the designation is not yet adopted and it is recognised attracts limited weight, it demonstrates the Council's emerging position regarding the importance of this local landscape and its protection.*

49. The Council also confirmed with the Applicant that East Claydon was scoped out of the LVIA for assessment.

Item 4(c) Landscape and visual mitigation

50. The ExA raised a concern about the use of the term "potential mitigation" in the outline LEMP. Mr Kozelko confirmed that this is the wording typically used but also accepted, by reference to the Council's response to the ExA's Second Written Questions, that "mitigation to be delivered" would be an effective alternative which managed the ExA's concerns. The Applicant was issued AP12 to address this aspect of the Council's answers to the ExA's Second Written Questions.

Item 5: Water environment

51. The Council did not make any specific points under this Item. It will review the further documents that are submitted at Deadline 5.

Item 6: Cultural heritage

52. Mr Kozelko introduced Mr Kenneth Sabel to speak to this issue. Mr Sabel referred to the note produced by the Council and submitted at Deadline 4 **[REP4-090]** and explained that this had taken into account his discussions with the Applicant. Mr Sabel also highlighted there was an error in the note in respect of Rosehill Farm and explained that the Applicant and Council do not agree that effects on that heritage asset. A further row in the Council's table for Bernwood Farmhouse had been left incomplete because the Council was unsure on the level of effect that the Applicant would identify. Mr Sabel confirmed that this note reflected the disagreements between the Applicant and the Council.

53. The ExA asked about Bernwood Farmhouse and its candidature for local listing. At that time Mr Sabel was not able to give a specific answer. The Council was asked to confirm the timescales for listing of this assert and this was entered as AP14.

54. ***Post Hearing Comment:*** *the Bernwood Farmhouse is being considered through the local listing process, and this is likely to come into effect in early 2027. It is recognised that limited weight can be given to that prospective future listing.*

55. Following submissions from the Applicant on the distinctions between its position and the Council's Mr Sabel gave further comment on the revised Annex D to the Archaeological Desk-Based Assessment. First, Mr Sabel pointed to the fact that there was a lot of new detail in the baseline but that there had not been updated levels of harm as a result. He also highlighted the continued disagreement on assessments of level of harm for some assets. That includes where there had been a mistaken approach to the baseline; for example the description of Ponds Farmhouse incorrectly identified it as 19th Century whereas the Council identified it as 17th to early 18th Century.

56. There are also a number of occasions where the Applicant said that the Proposed Development would not obscure the heritage asset but appear in its setting. This, the Applicant argued, largely preserved settings with only slight negative effects. Mr Sabel did not agree with this idea that extensive modern intrusion into the setting of a designated heritage asset does not block the view and only results in slight diminution

of significance. He considered it had a notable effect on the character of the views. On some occasions there was complete blocking of the views which made a major contribution to the significance of the asset and that might have been considered substantial harm by some people. Mr Sabel emphasised that modern contrasting development does not really sit neutrally in the setting of heritage assets.

57. The ExA asked where obscuring of views particularly concerned the Council, and highlighted the Church of St Mary. Mr Sabel agreed with that asset, but also raised concerns about the Claydon Conservation Area and views associated with Knowl Hill. He considered there were other situations of this as well, but that the Church of St Mary was an important one. He also highlighted that some of his concerns about omissions that were present which opportunity had not yet occurred to discuss with the Applicant. Both sides agreed the benefit of continued discussions.

58. Mr Sabel concluded by explaining that it is likely that on certain issues disagreement was likely to continue due to the disagreement of professional judgment.

59. Mr Kozelko also highlighted the concern in the submission about how noise and non-visual effects had been taken into account. He introduced Councillor Collingwood who had concerns about the extent of the harm to Claydon House. He highlighted the concentration of cultural assets in the area.

Item 7: Transport and access

Item 7(a): Outline CTMP

60. Mr Kozelko confirmed that the Council still sought business representation on the Traffic Management Group. However, he recognised that a balance had to be struck in the number of people present. Overall, the Council considered that this addition to the Group should be made as effects on businesses (and related tourism) was a specific concern that the Council had, and that concern would be reduced by such a step.

61. The Council confirmed that it had no concerns regards revised mode-share wording included in the Outline CTMP.

Item 7(b): Modelling at the A41/Station Road junction

62. Mr Kozelko confirmed that the Council were satisfied in respect of the modelling. Mr Kozelko introduced Mr James Duncan who confirmed the modelling outputs showed the junction retained capacity to accommodate the assessed construction traffic.

Item 7(c): Construction Traffic Review

63. Mr Kozelko confirmed that the Council did not have comment on this issue as ultimately the Council had assessed the highway as a whole on the basis of the route that was put before it. It was not in a position to and had not considered specialised operational and biosecurity effects on Preston Farms and TCS Biosciences.

Item 7(d): Glint and glare effects

64. On glint and glare, and in line with the Council's response to the ExA's Second Written Questions, Mr Kozelko confirmed that the Council's concerns arose out of the apparent classification of local roads as low sensitivity receptors. In particular, these were small or narrow roads which would still have high speeds (up to 60 miles per hour). Mr Kozelko highlighted that the severity of effects on the road could be very high given the impact of a crash. Thus, he identified the focus here for the level of sensitivity selected was likely susceptibility. Mr Kozelko confirmed that the concern, including with the Pager Power guidance, was that the default appears to be to characterise local roads as low sensitivity.

65. Mr Kozelko went on to highlight that the Pager Power guidance is not Government issued guidance but rather the guidance of a private entity that has published this guidance for its own use. Given the use of the roads as well (given the construction and HGVs being present) the Council came to the conclusion that the sensitivity may be too low. Mr Kozelko queried that the Applicant might consider such roads be medium sensitivity, which could result in moderate effects that may be significant.

66. The Applicant submitted that it had produced an assessment addressing the question of medium sensitivity and the impact that that would have on the assessed effects for the Scheme. As AP21 the Applicant was directed to share the specific Pager Power

guidance, and as AP22 to provide the further assessment of local roads, to the Council before D5. The Council welcomed being shown this information.

67. ***Post Hearing Comment:*** *the Council notes that the paper requested at AP22 from the Applicant was provided late in the day on Friday 24 July 2026. The Council has also not had sight of the Pager Power 2022 guidance which the Applicant was directed to provide under AP21. In the absence of sufficient time to consider the paper provided, the Council will provide its comment on these documents at the next deadline. It would welcome seeing the Pager Power guidance.*

Item 8: Population

Item 8(a): The Applicant's assessment of population effects

68. Mr Kozelko introduced Ms Anna Morris to address the population issue. Ms Morris indicated that the Council would appreciate the provision of greater clarity on the assessment (as offered by the Applicant), as the narrative assessment that the Applicant provided in the baseline is then only partially covered and cherry-picked in the remainder of the narrative assessment that follows. She considered that it was not clear then was how the conclusions in Table 14.25 were reached as a result.

69. In respect of Table 14.25, she also highlighted that there is an absence of a granular supporting appendix to identify each relevant receptor or receptor cluster with their specific sensitivities and thus their specific mitigations.

70. She also highlighted that the Council consider that further clarity was required where different individual parts of a receptor cluster were experiencing higher levels of sensitivity, and applying the Applicant's significance matrix would indicate a significant effect, but then Table 14.25 gave a more diluted response. In particular, given the exercise of professional judgment to assess effects as less than expected, Ms Morris emphasised that further clarity on how that expertise has been used to downgrade effects to non-significant would assist in understanding the Applicant's position.

71. Following the Applicant indicating that it would provide that further clarity, the Council confirmed we would look further at anything submitted by the Applicant at Deadline

5 and how it had captured highly sensitive and bespoke receptors. This was welcomed as AP24 and AP25.

Item 8(b) Effects on Preston Farms Ltd and TCS Biosciences Ltd

72. The ExA asked the Council about it ultimately holding the responsibility for discharging requirements related to biosecurity matters for Preston Farms and TCS Biosciences. Mr Kozelko confirmed that the Council did not have anyone with the appropriate expertise, and that it would be something that the Council would need to seek assistance on. Mr Kozelko indicated that this might be something that could be achieved by engaging further with the Applicant so that resource to do this work could be secured. Mr Kozelko indicated that this was a matter which may benefit further from speaking to the Applicant and Preston Farms/TCS Biosciences about.

73. In response to Preston Farms/TCS Biosciences suggesting that a provision for consultation by the Council with them be included in the DCO, Mr Kozelko indicated that in principle the Council would be open to this. However, he indicated that the Council would wish to take that issue away and think further. He also recognised that this could put the Council in the difficult position of the Applicant offering details for discharge which then Preston Farms/TCS Biosciences clearly state they are not satisfied with.

74. The Applicant also suggested that the discharge of a requirement related to Preston Farms and TCS Biosciences might instead be a matter assigned to the Secretary of State for discharge instead. The Council indicated it would go away and think about that issue.

75. ***Post Hearing Comment:*** *the Council remain concerned about the expertise required to full address discharge of this requirement. The Council consider that this matter should be explored in discussions with the Applicant to ensure securing the right expertise. However, given the important local context, the Council still consider it should be the discharging authority rather than the Secretary of State. As to specific consultation requirements, the Council consider that all options should remain open in the requirement and there should not be a specific consultation provision. Such a provision,*

it is considered, may also detract from the role of the Applicant properly to engage with that consultation prior to submitting documents to seek discharge.

Item 12: Health

Item 12(a): Overall approach and presentation

76. Ms Morris also addressed health matters on behalf of the Council. She welcomed the Applicant being assigned AP33 to update the non-technical summary to take account of the health assessment.

77. Ms Morris went on to highlight that the Council has similar concerns with the health assessment as to that under the population assessment. She explained that the Council sought a summary of this issue which very clearly connected the component parts of receptors to the specific impacts on them, with a proper explanation of the professional judgment which has been applied to those receptors, so that there would be greater clarity in the blended judgments reached.

Item 12(b)(i): Assessment methodology – ISEP Guidance

78. On this issue Ms Morris explained that the Council has accepted that the documentation which the Applicant has produced was produced before the particular piece of guidance had come into force. However, she asked that the tenets of the social impact guidance be brought through in the assessment more clearly. She recognised some of this was already available in the documents, and that it is really getting more clarity on the Applicant's perspective, particularly on community in combination implications and how that might feed into specifically geographically different health, wellbeing, quality of life, social coherence, and other types of effect. Ultimately, she explained that it would assist to have some further supplementary work on the Health and Wellbeing Summary Statement which connect it more clearly to the Social Impact Assessment Guidance. However, she recognised the timeline involved on that guidance.

79. The Council welcomed AP34 which addressed this issue and would provide a note on then methodology which has been applied in the health and wellbeing assessment and how it applied to the relevant ISEP Guidance.

Item 12(b)(ii) and (iii): Significance of effects and mitigation

80. Following submissions from CSAG, Ms Morris explained that she also supported those comments. She explained that the Council have concerns about the absence of in-combination assessment and the reliance upon single topic findings. Ms Morris explained that this was a key flaw in the way that the materials were presented in the Chapter. She explained that this was a further update that the Council would seek. She also noted that it is really the lived experience of the Proposed Development which seems not to be covered.

81. In particular, Ms Morris then went on to explain that she had seen comparable assessments and exercises in respect of hotspots for communities and the different impacts of a scheme which would be experienced in different specific locations. This would allow those effects to be mapped and for specific mitigations that were relevant to that location and/or receptor be identified. Ms Morris considered this would bring a greater level of robustness to what was being presented. And she considered that this should take in a host of impacts including noise, climate change, dust, traffic, going beyond the typical issue of amenity in the sense of landscape and visual amenity.

82. Following a further question from the ExA on the terms of the SoCG, Ms Morris confirmed that what the Council was looking for was greater granularity and specific naming of geographic subpopulations for which targeted mitigation was going to be applied, and with greater clarity on that mitigation given some of this is rather generic.

83. Ms Morris also highlighted a specific example in para 7.3.35 and 7.3.36 of the Annex which provided a stronger commitment to consultation with specific groups which was welcome. However, Ms Morris asked for an indication of whether any financial funds would be made available to ensure that this could actually be secured, given it looked currently more like a commitment to consult rather than a commitment to deliver.

84. Following the Applicant asking whether the Council could share examples of where it had seen this approach done, the Council confirmed it could provide such examples. This was accepted as AP35.

85. ***Post Hearing Comment:*** *the Council has prior to deadline 5 provided a note from Ms Morris addressing AP35. The text of that note is provided with the Council's submissions at Deadline 5.*

Item 9: Soils

Item 9(a): The applicant's consideration of effects on soil

86. Mr Kozelko explained that his expert was unavailable for this issue. Mr Kozelko confirmed that the wording in the soils section of the SoCG with the Applicant would be updated. This was recorded as AP37.

87. ***Post Hearing Comment:*** *prior to Deadline 5 a further meeting was held between the Applicant and the Council and the need to update the wording on soils has been actioned and submitted.*

88. In respect of the magnitude of effect on ALC Grade 2 land, Mr Kozelko explained the Council's position that it considered that assessment as a low magnitude of effect was appropriate rather than the negligible conclusion reached by the Applicant. Mr Kozelko explained that this was applying the same logic as had been taken to the Grade 3 land. He explained that this was important because of the very high sensitivity of Grade 2 land. He also explained that this was the appropriate approach because this measurement was being taken in the operational phase of the Proposed Development. Mr Kozelko confirmed that this was essentially a disagreement between experts on the application of the methodology. The Council confirmed that it considered the loss of that 3ha of land for the period of operation should be assigned a low magnitude of effect.

89. The Council welcomed the provision of AP38 for the Applicant to provide detail the effect of a change in magnitude of impact for ALC Grade 2 land.

Item 9(b): Topsoil classification and soil handling

90. Mr Kozelko stated that the Council's concern about the classification of the topsoil remains and that the point is not conceded. As a result, the Council thinks the sensitivity is underassessed. However, the Council recognises that this issue can be managed through the soil management plan. So overall, the Council considered the

issue resolved even if there remained a technical issue about the sensitivity of the topsoil. Mr Kozelko confirmed and AP40 provided that the Council would clarify whether it sought any further amendments to the Outline Soil Management Plan.

91. ***Post Hearing Submission:*** *as confirmed above, the Council engaged in a further meeting with the Applicant. Remaining wording additions have been addressed for the upcoming deadline.*

Item 9(c): Reinstatement of soils

92. The Council confirmed that it was not raising a concern on the status of blue and green infrastructure. However, Mr Kozelko confirmed that this would be addressed in the SoCG insofar as needed.

Item 10: Noise and vibration

Item 10(a): The Applicant's consideration of background noise levels

93. Mr Kozelko confirmed that for noise his expert was unavailable. Mr Kozelko went on to explain that the disagreement that existed on background noise levels in the documents and at ISH1 remained. He highlighted that BS 4142 directs that absolute and relative sound levels are taken into account, and that importantly one is not disregarded for the other. Mr Kozelko highlighted that there were situations where there was a considerable 5 or 10dB plus uplift against the tranquil background as a result of the Proposed Development and that ultimately the Council's professional judgment was that this should be weighed more heavily in the analysis for those receptors in tranquil locations.

94. Of the Applicant's comments on there being no change to the quality of life, the Council disagreed and again emphasised that this outcome could only be achieved by setting the LOAEL and SOAEL at much higher levels than the background noise level. He highlighted that, as a result, on the methodology applied this resulted in all of the noise being below these levels. But, for example, Hogshaw Farm experienced an uplift of over 10dB at night compared to where it is currently. That did not breach the Applicant's set LOAEL but it did indicate a significant increase and raised a concern about a moderate effect rather than a minor effect.

95. The Council did however accept the role that it had in the outline plans, and also recognised that such uplifts were in specific locations. However, the Council confirmed that for those locations with such uplifts would experience a negative effect on quality of life.

96. The Council confirmed that it would update the SoCG and AP42 was issued in respect of this. The Council also welcomed and will comment on the document related to acoustic character and effect on quality of life under AP41.

97. ***Post Hearing Submission:*** *as confirmed, the Council has worked to update the relevant text in the relevant SoCG.*

Item 10(b): The Applicant's vibration technical note regards piling and the related updated Design Committments

98. The Council confirmed that it did not raise an objection in respect of this and accepted the Design Commitments.

Item 10(c): Public Right of Way Users

99. On the issue of PRoW users and the WHO Guidance, Mr Kozelko highlighted that the Council considered that a parameter for parkland or other such areas was appropriate in this case. Mr Kozelko also re-empahsised the Council's position on the issue of background noise level. In respect of the argument that such users were transient, Mr Kozelkoe emphasised that the noise would be experienced along PRoWs and that the ExA had been on site and could imagine the difficulty of what would be an electrical sound equivalent to someone constantly whispering in a person's ear as an equivalent level of noise. The Council welcomed AP46 and the Applicant submitting the relevant WHO Guidance.

100. In respect of PRoWs in the SoCG it was confirmed that the issue as currently listed was merely confirming that both sides agreed that PRoWs should be assessed whereas there was disagreement as to the outcome.

101. ***Post Hearing Note:*** *as reflected in the SoCG, the Applicant and Council agree that noise effects on PRoW should be assessed, but disagree with and the Council has*

some concerns about the assessment outcome for the reasons addressed above and in the Council's ISH1 submission. If required the final version will include a clarification.

Item 10(d): Donor Livestock

102. The Council did not raise an independent point on this issue but recognises the difficulty that it has also identified under Item 8(b) and discharge of requirements.

Item 11: Air quality

103. The Council did not make specific submissions under this Item.

Item 13: Cumulative effects

Item 13(a): Assessment methodology

104. Mr Kozelko confirmed that the Council agreed the short and long list as part of the cumulative effects methodology. He also highlighted that Ms Hearn had passed on further information to the Applicant about the new Furzen Solar Farm and the Council welcomed AP51 for the Applicant to consider whether it should include this in a high-level appraisal of cumulative effects.

Item 13(b): Cumulative effects

105. Moving on from method, Mr Kozelko highlighted the Council's concerns on the approach to cumulative effects and in particular the pigeonholing of effects and not appropriately combining them. In addition, Mr Kozelko highlighted the concern that the Applicant was assuming the effectiveness of mitigation of other schemes (and this essentially assuming that they will all be effective) and raised the issue of whether that can be appropriately considered a reasonable worst case.

106. Mr Kozelko highlighted that this area was unusually and remarkably effected by particularly large national infrastructure projects, along with other projects and therefore that the Applicant should not take an overly favourable approach to the mitigation effects of these schemes.

107. Mr Kozelko fairly recognised that the Applicant does accept some significant effects here, and Mr Kozelko accepted that this was ultimately a matter of judgment upon which the Council has disagreed with the Applicant and considers effects are

underassessed. Mr Kozelko also highlighted that this issue combined with the underlying analyses on the other environmental issues that were being considered as part of the Examination, and that this flowed through to the cumulative effects assessment. Ultimately, disagreement about inputs was going to also result in disagreement about outputs.

Item 14: Review of actions

108. The Council has addressed Action Points as appropriate through this submission and also in the other documents that it will be submitting at Deadline 5.

Item 15: Closing

109. At the close of the hearing, Mr Kozelko informed the ExA that he would be attending Compulsory Acquisition Hearing 2 remotely. The Council did attend that hearing but did not make any submissions and an independent Post Hearing Note is not produced.

Appendix 1. Statkraft Greener Grid Park (AP3)

Buckinghamshire Council

www.buckinghamshire.gov.uk

Report to Buckinghamshire Council – Strategic Sites Planning Committee

Application Number:	25/01297/APP
Proposal:	Construction of a greener grid park comprising energy storage and grid balancing equipment and associated infrastructure including access, drainage, landscaping and other incidental works
Site location:	Land North of East Claydon Substation, East Claydon Road, East Claydon, Buckinghamshire,
Applicant:	Statkraft UK Ltd
Case Officer:	Zenab Hearn
Ward affected:	Grendon Underwood and the Claydons
Parish-Town Council:	East Claydon
Valid date:	28 April 2025
Determination date:	10th July 2026 (EoT)
Recommendation:	The recommendation is that the application be delegated to the Director of Planning Growth & Sustainability for APPROVAL subject to the conditions as proposed and any other considered appropriate by Officers.

1.0 Summary and Recommendation

1.1 This application seeks full planning permission for the development of a Greener Grid Park comprising a battery energy storage system (BESS), synchronous compensator infrastructure, substation works and associated development on land in proximity to the East Claydon substation. The proposal would support the storage, balancing and stabilisation of electricity within the transmission network.

1.2 The principal issues for consideration are; the acceptability of the proposal in principle having regard to national and local policy support for renewable and low carbon energy infrastructure; the impacts on landscape character and visual amenity, including cumulative effects; the effect on the setting of nearby heritage assets; impacts on residential amenity; highway and construction traffic impacts; flood risk and drainage; ecological impacts including biodiversity net gain; and matters relating to fire safety, noise and environmental protection.

1.3 The assessment identifies that the development would give rise to significant adverse effects on landscape character and visual amenity, including cumulative effects arising from the presence of other energy infrastructure within the wider area. There would also be less than substantial harm to the setting of designated heritage assets, which attracts great weight in accordance with statutory duties.

1.4 However, the proposal would deliver significant benefits, including its contribution to national energy infrastructure, grid resilience and the transition to a low carbon energy system, to which significant weight is afforded under national policy. Additional benefits include biodiversity net gain and the temporary and reversible nature of the development.

1.5 Taking all matters into account, it is concluded that the benefits of the proposal outweigh the identified harms.

1.6 The application is reported to the Strategic Sites Planning Committee due to its scale, complexity and the significance of the issues raised, including landscape impacts, cumulative effects and matters of local and strategic importance.

1.7 The application has been called in by Councillor Philip Gomm (Quainton Ward) and Councillor Frank Mahon (Grendon Underwood Ward), following requests from East Claydon Parish Council and Granborough Parish Council.

1.8 The call-in request was agreed at Parish Council meetings held on 17 June 2025. The request cites the scale and complexity of the proposal, together with its potential impact on the local community and environment and considers that it is in the public interest for the application to be determined by Planning Committee to enable full scrutiny and representation.

1.9 **Recommendation –** The recommendation is that the application be delegated to the Director of Planning Growth & Sustainability for APPROVAL subject to the conditions as proposed and any other conditions considered appropriate by Officers.

2.0 Description of Proposed Development

2.1 The application site extends to approximately 45.3 hectares of predominantly agricultural land located within the Aylesbury Vale area of Buckinghamshire, to the north-west of the existing National Grid East Claydon Substation and approximately 650m north-east of East Claydon village.

2.2 The Site comprises a series of arable and pastoral field parcels bounded by mature hedgerows, hedgerow trees and field ditches, with a disused railway corridor broadly bisecting the Site on a north-south axis. Two electricity pylons and associated overhead lines are present within the Site.

2.3 The Site is generally flat, with levels ranging from approximately 95.1m AOD in the south-east to approximately 85m AOD in the north-east.

2.4 The Site is bounded to the south by East Claydon Road, beyond which lies the existing East Claydon substation and a small number of residential properties, including Station House. The surrounding area is rural in character, comprising predominantly open agricultural land

interspersed with farms, small businesses and scattered dwellings. Nearby settlements include East Claydon (approximately 700m to the south-west), Verney Junction (approximately 700m to the north-west) and Winslow (approximately 1.5km to the north-east).

2.5 A public footpath (BM ECL 3/1) is located to the south-west of the Site, linking to a wider network of public rights of way within the surrounding countryside.

2.6 The Site is not subject to any statutory ecological designations and does not contain any designated heritage assets. However, a number of non-designated heritage assets have been identified within the Site, including archaeological remains associated with Romano-British activity.

2.7 Part of the Site lies within a Minerals Safeguarding Area (MSA) for alluvial deposits (clay, silt, sand and gravel) as identified in the Buckinghamshire Minerals and Waste Local Plan.

2.8 The Site is located within a rural landscape characterised by agricultural fields, hedgerows and dispersal of built form, and falls within Landscape Character Type "Shallow Vales" within the wider Upper Thames Clay Vales National Character Area.

2.9 There are existing utility constraints across the Site, including overhead electricity lines and pylons.

Proposed Development

2.10 Full planning permission is sought for the *c*onstruction of a Greener Grid Park comprising energy storage and grid balancing equipment and associated infrastructure including access, drainage, landscaping and other incidental works. Planning permission is sought on a temporary basis for a period of 40 years, following which the development would be decommissioned and the Site restored to agricultural use.

2.11 The Proposed Development would comprise a Battery Energy Storage System (BESS) and grid balancing equipment, including synchronous compensators, inverters and transformers. These elements would enable the storage of electricity and its release to the National Grid during periods of high demand, thereby supporting grid stability and facilitating increased use of renewable energy.

2.12 The main built development would be contained within a defined compound located within the northern part of the site, occupying approximately 8.6 hectares, with the remainder of the site comprising landscaping, access infrastructure and ancillary works.

2.13 The Battery Energy Storage System (BESS) would comprise up to 144 battery storage units arranged in four quadrants across the site. Each unit would be connected to associated inverter and transformer equipment, enabling electricity to be stored at times of surplus generation and exported back to the grid when required, thereby supporting the balancing of the electricity network.

2.14 In addition to the BESS, the development includes synchronous compensators, comprising large rotating electrical machines housed within purpose-built buildings. These do not generate or store electricity, but instead provide grid stabilisation services, including

voltage control and system inertia, operating alongside the BESS to support the efficient functioning of the electricity network.

2.15 The scheme also incorporates a 400kV substation compound and transformer yard, together with associated electrical infrastructure including switchgear, metering equipment and control buildings. This infrastructure provides the connection between the development and the wider electricity transmission network.

2.16 A range of ancillary buildings and operational infrastructure are also proposed, including control rooms, communications buildings, plant rooms, welfare and office facilities, storage buildings and maintenance areas, together with emergency diesel generators and cooling equipment necessary for the operation of the site.

2.17 The development includes internal access roads and parking areas for maintenance vehicles, together with perimeter security fencing and CCTV. Lighting is proposed but would be operated intermittently, primarily during maintenance activities. Landscaping forms an integral part of the scheme and includes bunding, planting and ecological buffers, as well as sustainable drainage systems and water management features.

2.18 Fire safety infrastructure is also incorporated within the development, including underground water storage tanks, hydrants, and firewater management systems. The battery units themselves include integrated fire detection and suppression systems to manage fire risk as part of the overall site design.

2.19 The development also includes an underground cable connection to the planned

replacement East Claydon substation to the south of the Site.

2.20 The Proposed Development is intended to operate intermittently, typically for short periods (up to approximately 1–4 hours within a 24-hour period), responding to fluctuations in electricity demand. The facility would be largely unmanned during operation, with only occasional maintenance visits required.

2.21 Following submission of the application, the Applicant provided an Environmental Statement Addendum (March 2026) together with additional supporting information in response to consultation comments. The Addendum provides supplementary and updated assessment work, including further information in relation to ecology, archaeology and cumulative effects.

2.22 The Applicant has confirmed that there have been no amendments to the Proposed Development itself and that the description and layout of the scheme as originally submitted remain unchanged.

Rochdale Envelope

2.23 The application has been submitted on the basis of a defined parameter-based approach, commonly referred to as the "Rochdale Envelope". This approach allows for a degree of flexibility in the detailed design of the development, within clearly defined limits, whilst ensuring that the environmental effects have been robustly assessed on a worst-case basis.

2.24 In this case, the proposed development incorporates flexibility in relation to certain components of the scheme, in particular the precise layout and configuration of the battery units and associated inverter equipment within the defined development areas. This reflects the evolving nature of battery storage technology and the fact that detailed procurement and final specification typically take place following the grant of planning permission.

2.25 The maximum height of development is defined by the tallest elements within the scheme, namely the substation transformers at approximately 12.5m, with the majority of infrastructure substantially lower, including battery units (up to approximately 4.5m) and associated buildings, generally below 7m in height.

2.26 The developable envelope is clearly defined within the submitted plans, with built development confined to a main compound area of approximately 8.6 hectares within a wider application site of approximately 45.3 hectares. Within this envelope, the precise layout of battery units and associated infrastructure may vary; however, all development must remain within the assessed parameters in terms of scale, extent and height.

2.27 The Rochdale Envelope approach is a well-established and accepted method in planning, particularly for complex infrastructure projects where a degree of design flexibility is necessary. It ensures that decision-making is based on a robust understanding of potential impacts, whilst allowing the scheme to respond to technological advances and detailed engineering requirements.

Decommissioning and Restoration

2.28 The proposed development is a temporary form of infrastructure, with the applicant seeking permission for a fixed operational period of 40 years. At the end of this period, the development would be decommissioned and the land restored.

2.29 The submitted Planning, Design and Access Statement confirms that the decommissioning process would involve the removal of all above-ground infrastructure associated with the Greener Grid Park, including battery storage units, inverters, transformers, buildings, hardstanding and ancillary equipment. The decommissioning phase is anticipated to take place over a period of approximately two years and would broadly follow the construction process in reverse.

2.30 In addition, temporary infrastructure associated with the construction and operation of the site, including access tracks and ancillary works, would be removed as part of the decommissioning process. The site would then be restored to a stable landform and returned to an appropriate after-use, which is expected to be agricultural use consistent with the existing character of the site and surrounding landscape.

2.31 The restoration of the site would also be informed by the proposed landscaping and ecological strategy, with opportunities to retain beneficial habitat features where appropriate, ensuring that ecological enhancements delivered as part of the development are not unnecessarily lost.

Background to the Greener Grid Energy Park

2.32 The application seeks planning permission for a "Greener Grid Park" comprising a battery energy storage system (BESS) and synchronous compensator equipment, together with associated infrastructure. The purpose of the development is to support the operation of the national electricity network by providing energy storage and grid stabilisation services.

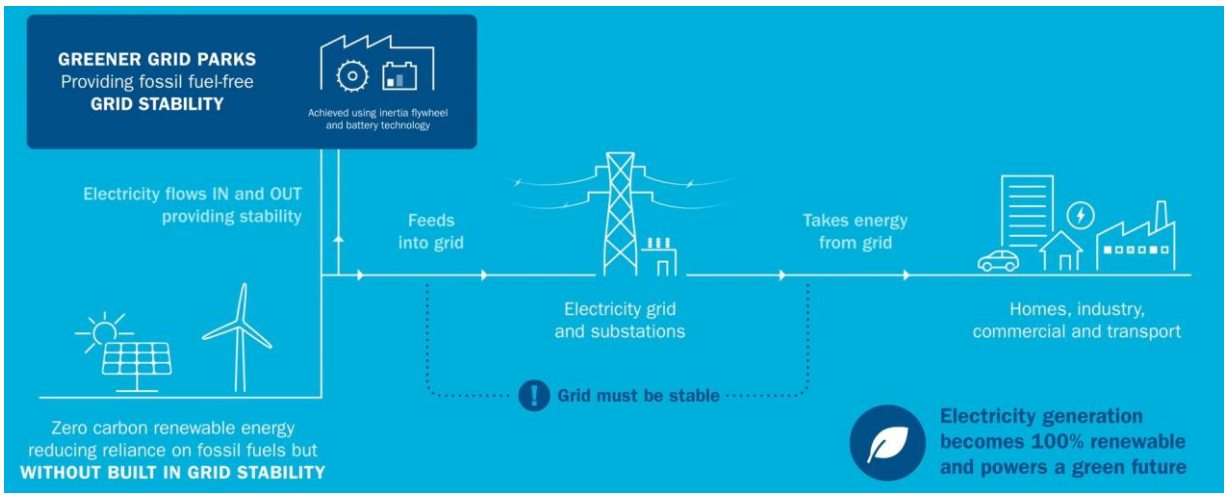
2.33 Battery energy storage systems store electricity generated at times of low demand and release it back to the grid when demand is higher. This helps to manage fluctuations in electricity supply, particularly given the increasing reliance on intermittent renewable energy sources such as wind and solar. The proposed development therefore plays a role in balancing the electricity network and reducing reliance on fossil fuel generation.

2.34 In addition to battery storage, the proposal incorporates synchronous compensators. These are large rotating electrical machines which are connected to the transmission network but do not generate electricity themselves. Instead, they provide technical services to stabilise the grid, including maintaining voltage and supporting system frequency.

2.35 Historically, these stabilising functions were provided by conventional fossil fuel power stations, which inherently delivered inertia and voltage support as part of their operation. As these power stations are decommissioned and replaced by renewable energy technologies, which do not provide the same inherent stability, there is an increasing need for alternative forms of grid stabilisation.

2.36 Synchronous compensators address this need by mimicking the stabilising characteristics of traditional power generation without producing emissions. They provide "inertia" to the system, helping to regulate frequency and prevent sudden fluctuations, and can absorb or supply reactive power to maintain appropriate voltage levels.

2.37 The combined function of battery storage and synchronous compensation would enable the network to operate more efficiently and reliably, particularly as the proportion of renewable energy generation increases. In this context, the proposed development is intended to contribute to the resilience and flexibility of the electricity network, supporting the transition to a low-carbon energy system.



3.0 Relevant Planning History

Reference: 16/04025/APP
Development: Creation of three temporary vehicular accesses to facilitate development of a new 18km 132kV line from Bicester to East Claydon.
Decision: Approved Decision Date: 10 April 2017

Reference: 24/02556/SO
Development: The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Request for a Scoping Opinion
Decision: EIA Required Decision Date: 14 November 2024

3.1 The application has been subject to screening under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and is accompanied by an Environmental Statement (ES). The ES assesses the likely significant environmental effects of the proposed development, including during construction, operation and decommissioning phases. The scope of the assessment includes landscape and visual impact, noise and vibration, biodiversity and ecology, traffic and transport, climate change and resilience, and archaeology.

3.2 An Environmental Statement Addendum (March 2026) has subsequently been submitted in response to consultation comments, providing supplementary and updated environmental information. This does not amend the development proposals but should be read alongside the original ES as part of the overall environmental information before the Local Planning Authority.

Surrounding Area

3.3 In addition to the site-specific planning history, it is important to recognise the presence of existing, consented and proposed energy infrastructure within the wider area surrounding the application site. This context is relevant to the assessment of cumulative effects, particularly in relation to landscape character, visual amenity and the perception of the area as an “energy landscape”.

3.4 The most relevant schemes are summarised below:

Tuckey Solar Farm (19/00983/APP and 21/04255/APP)
Located immediately to the east of the application site, this scheme comprises a c.25MW solar farm with associated infrastructure and public rights of way diversion. Planning permission was granted in April 2021 and the scheme is expected to be constructed and operational in the near term.

Rookery Farm BESS (23/03875/APP)
Located approximately 750m to the south-east, this proposal sought permission for a large-scale battery energy storage system (up to 500MW). The application was refused in

December 2024.

Rookery Farm, Granborough – Appeal Ref: APP/J0405/W/25/3360815 (Application Ref: 23/03875/APP) – Appeal Allowed

The appeal related to a proposal for a Battery Energy Storage System (BESS) at Rookery Farm, Granborough. The application was refused by Buckinghamshire Council and subsequently determined at a Hearing held on 22 July 2025. The appeal decision was issued on 11 September 2025, with the Inspector allowing the appeal and granting planning permission subject to conditions.

In reaching this decision, the Inspector identified the main issue as the effect of the development on landscape character and visual amenity. Whilst it was accepted that the proposal would result in a moderate adverse effect on landscape character, this harm was found to be limited in extent and capable of mitigation through landscaping, with visual effects reducing over time. The Inspector found no significant harm in relation to highways, residential amenity, ecology, heritage, flood risk or safety matters, subject to appropriate conditions. Substantial weight was given to the benefits of the scheme, including its contribution to energy security, support for renewable energy infrastructure and biodiversity net gain. In the overall planning balance, these benefits were considered to outweigh the identified landscape harm, such that the conflict with development plan policy was not determinative and permission was granted.

Hogshaw Road BESS (24/03262/APP)
Situated approximately 2.2km to the south-east, this proposal relates to a 99MW battery energy storage scheme with associated infrastructure. The application is under consideration.

Fox Covert Solar Farm (20/02582/APP)
Located approximately 2.6km to the north-east, this consented 22MW solar farm has planning permission but has not yet been constructed.

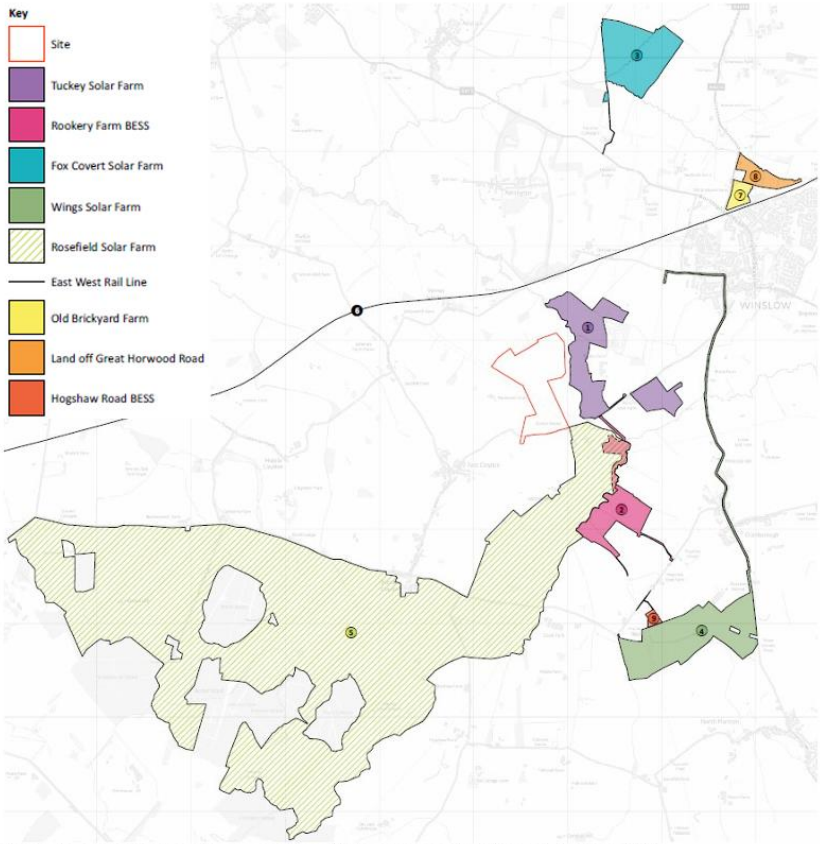
Wings Solar Farm (23/01939/SO)
A proposed 49.9MW solar farm located approximately 2.4km to the south. An EIA screening opinion has been issued confirming that an Environmental Impact Assessment is not required; however, no application has yet been submitted.

Rosefield Solar Farm (NSIP)
A nationally significant solar project located to the south-west of the site, associated with the East Claydon substation and progressed through the Development Consent Order process. This represents a large-scale solar generating station exceeding 50MW and is at the pre-application stage.

East West Rail
Located approximately 600–725m to the north of the site, this nationally significant infrastructure project comprises a new railway between Bedford and Cambridge. The scheme is currently progressing through the DCO process and includes associated

infrastructure which interacts with the wider energy network.

3.5 In addition to the above, a number of residential developments within Winslow (including land off Great Horwood Road and Old Brickyard Farm) have also been identified within the cumulative assessment, although these are of lesser relevance to the assessment of energy infrastructure impacts.



Officer Notes

3.6 The most notable nearby scheme is Rosefield Solar Farm, a large-scale solar photovoltaic development located in proximity to the application site and associated with East Claydon substation. This scheme has been the subject of a Development Consent Order (DCO) process, reflecting its scale as a Nationally Significant Infrastructure Project. The proposal includes extensive solar arrays and associated infrastructure and forms part of a wider cluster of energy generation and grid-related development in this part of Buckinghamshire.

3.7 In addition, planning permission and proposals have been brought forward for solar and energy storage development at Tuckey Farm and within the surrounding Claydon Vale area, including the solar proposal at Wings Farm and the Rookery Farm battery energy storage scheme, which has been allowed at appeal. These schemes, together with other consented and emerging solar and energy infrastructure developments within the locality, indicate the presence of multiple renewable and grid-related developments in proximity to the East Claydon substation, which forms part of the electricity transmission network.

3.8 The presence of these developments is recorded as part of the planning context for the site. Individual schemes have been identified and assessed within the cumulative effects assessment of the Environmental Statement, including consideration of their location, scale and status within the planning system.

3.9 The application site's proximity to the East Claydon substation reflects the role of this location as a connection point within the wider electricity network. The implications of the surrounding development context are considered separately within the cumulative landscape and visual impact assessment set out elsewhere in this report.

4.0 **Representations**

4.1 Statutory site publicity has been given to the application with the application being publicised by way of site notices and press notices.

4.2 The relevant planning issues raised within representations have been summarised in Appendix A alongside consultation comments received during the application.

5.0 **Policy Considerations and Evaluation**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan

5.2 The development plan for this area comprises:

- Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)
- Vale of Aylesbury Local Plan (15th September 2021)

5.3 There is no made neighbourhood plan for this area.

Material considerations

5.4 In addition, the following documents are relevant material considerations to the determination of the application:

- National Planning Policy Framework (NPPF) (2024)
- National Planning Practice Guidance (NPPG) - 'Planning Practice Guidance for Renewable and Low Carbon Energy' (2023), 'Climate Change' (2019), 'Natural Environment' (2024)
- The Climate Change Act 2008
- British Energy Security Strategy 2022
- EN-1: Overarching National Policy Statement for Energy (2025)

National Planning Policy Framework (NPPF)

5.5 The NPPF sets out a presumption in favour of sustainable development. This means approving development proposals that accord with an up-to-date development plan

without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date development proposals should be approved unless specific policies in the NPPF suggest that development should be restricted, or the level of harm would 'significantly and demonstrably outweigh the benefits' when assessed against the requirements of the NPPF.

5.6 As set out by NPPF paragraph 12, the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

5.7 The NPPF sets out a proactive approach towards the provision of renewable energy development to meet aims to reduce greenhouse gas emissions and meet renewable energy targets.

5.8 Chapter 14 of the NPPF sets out the national planning policy with regards to climate change, flooding and coastal change. This requires the planning system to support the transition to a low carbon future and to support renewable and low carbon energy and associated infrastructure. Paragraph 165 of the NPPF requires plans to help increase the use and supply of renewable and low carbon energy and heat. Paragraph 168 of the NPPF states that applications for renewable energy development are not required to demonstrate the overall need for renewable energy. It also requires applications to be approved where their impacts are (or can be made) acceptable.

National Planning Practice Guidance (NPPG) – Battery Energy Storage System

5.9 The NPPG notes that BESS play a crucial role in enabling flexible energy use and cost-effective decarbonisation of the energy system. They help balance the energy system at a lower cost, maximise the output from intermittent low-carbon generation sources like solar and wind, and defer or avoid the need for costly network upgrades and new generation capacity.

National Policy Statement

5.10 The Overarching National Policy Statement for Energy (EN-1) sets out national policy for energy infrastructure and is a significant material consideration in the determination of this application.

5.11 EN-1 identifies an urgent and ongoing need for substantial new energy infrastructure to ensure a secure, reliable and affordable energy supply, whilst meeting the Government's net zero commitments. **The need for such infrastructure is established at a national level and is not subject to reassessment on an application-by-application basis (Section 3.2)**.

5.12 The Statement recognises that low carbon energy infrastructure is of critical national priority and indicates that the benefits associated with such development, including contributions towards energy security and decarbonisation, are likely to outweigh residual

impacts in all but exceptional circumstances.

Principle and Location of Development

Vale of Aylesbury Local Plan (VALP): C3 Renewable Energy

5.13 The application proposes a "Greener Grid Park" comprising a range of energy infrastructure designed to provide both storage and stabilisation functions to the electricity network.

5.14 Policy C3 of the Vale of Aylesbury Local Plan (VALP) supports renewable and low carbon energy proposals, including associated infrastructure, subject to the assessment of environmental impacts. Whilst this infrastructure is not a renewable energy generating technology, it is an enabling infrastructure that facilitates the storage and release of electricity, supporting the integration of renewable energy into the grid system. As such, the proposal falls within the scope of policy support for low carbon infrastructure.

5.15 At a national level, the National Planning Policy Framework (NPPF, 2024) is a significant material consideration and requires the planning system to support the transition to a low carbon future and to increase the supply of renewable and low carbon energy. It also sets out a presumption in favour of sustainable development, which requires that planning permission be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits.

5.16 Further substantial weight is afforded through the Overarching National Policy Statement for Energy (EN-1), which is as referred to above a significant material consideration in the determination of energy-related proposals.

5.17 EN-1 further recognises that low carbon energy infrastructure is of critical national priority and indicates that the benefits associated with such development, including contributions towards energy security, decarbonisation and system resilience, are likely to outweigh residual impacts in all but the most exceptional circumstances. In this context, infrastructure which enables the balancing of electricity supply and demand, such as battery storage, plays an important role in supporting a resilient energy system.

5.18 The Site's proximity to the East Claydon Substation is a locational factor, as this type of infrastructure requires a grid connection in order to operate effectively. It is therefore recognised that such infrastructure has specific siting requirements. This functional need weighs in favour of the selected site.

5.19 In principle, therefore, the provision of this infrastructure in this location is acceptable, subject to a full assessment of site-specific impacts, including landscape, visual, amenity and environmental considerations that are assessed in this report.

Transport matters and parking

Vale of Aylesbury Local Plan (VALP): T4 Capacity of the transport network to deliver development, T5 Delivering transport in new development, T6 Vehicle Parking, C3 Renewable Energy

5.20 The application site is located to the north of East Claydon Road in a rural location adjacent

to the existing substation infrastructure. The surrounding highway network comprises primarily rural roads, with East Claydon Road identified as a classified C-road which is unlit, with no footways and no formal parking or waiting restrictions.

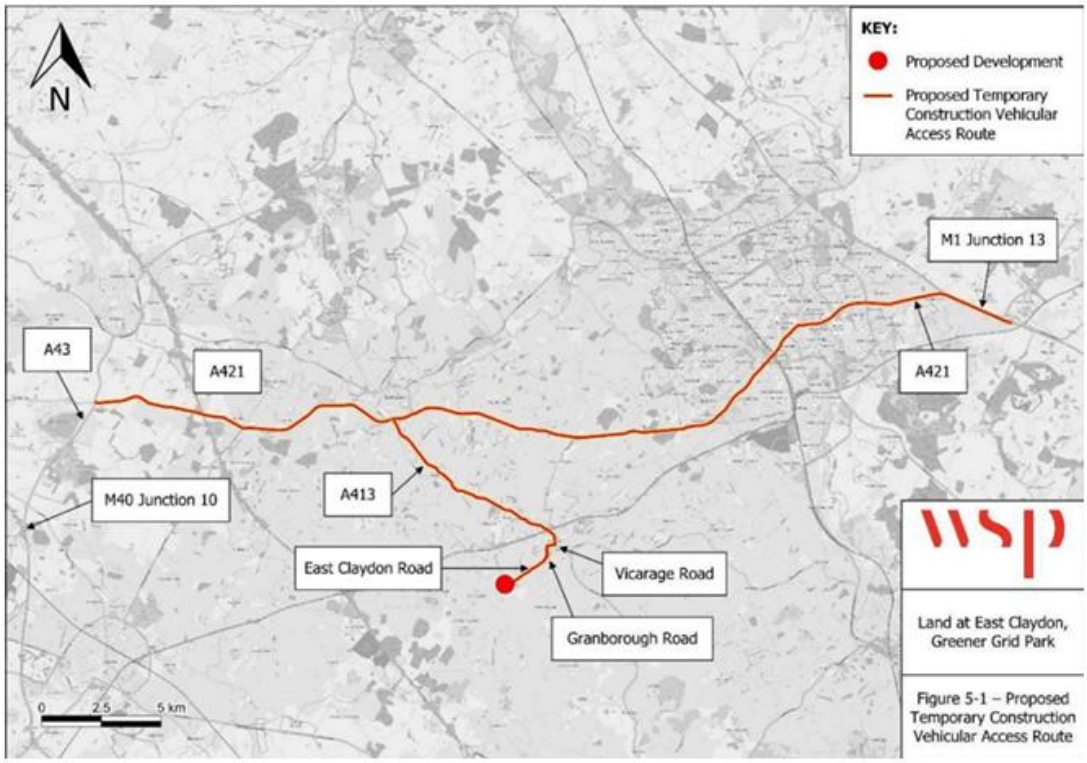
5.21 Given the nature of the proposed development (energy storage and grid balancing infrastructure), operational staffing levels are extremely low, with only occasional maintenance visits required (typically a single maintenance vehicle per month).

5.22 As such, the site is not reliant on frequent staff trips, and the limited level of operational travel demand reflects its functional infrastructure role. During construction, sustainable travel measures are proposed to be implemented via a Construction Staff Travel Plan, including car sharing and potential minibuses for workforce movements, to reduce reliance on single-occupancy vehicles, details of which would be secured by way of a condition.

Capacity

5.23 The Highway Authority has confirmed that the surrounding highway network including East Claydon Road and the wider construction route is capable of accommodating the forecast construction traffic and larger vehicles associated with the development.

5.24 The site can readily access the strategic road network. The construction vehicle route when leaving the site will consist of East Claydon Road, Granborough Road, Burleys Road, Vicarage Road, the A413 High Street, Buckingham Road and London Road and the A241 (east and west), and then onwards to the strategic highway network.



5.25 The submitted Transport Assessment and Environmental Statement include traffic surveys and cumulative assessments, including interaction with other consented developments such as the nearby substation works.

5.26 Predicted construction traffic levels, including HGV movements, have been reviewed and

are accepted by the Highway Authority, with daily flows distributed throughout agreed working hours to minimise peak period impacts.

5.27 Furthermore, a Construction Traffic Management Plan (CTMP) would ensure that construction activities are appropriately managed. Vehicle movements would be scheduled to avoid peak highway periods, traffic routing will be controlled, and measures will be in place to minimise impacts on the capacity of the local highway network.

5.28 Once operational, traffic generation associated with the development would be extremely limited, with only occasional maintenance visits required. As such, operational traffic levels would be very low and would not result in a material impact on the highway network.

Access

5.29 A new construction access is proposed from East Claydon Road. The Highway Authority has confirmed that acceptable visibility splays can be achieved in both directions, and these will be secured by planning condition.

5.30 The design of the access and internal road layout has been demonstrated to safely accommodate two-way HGV movements, with sufficient width provided to enable the manoeuvring and turning of large vehicles within the site.

5.31 In addition, the access arrangements ensure adequate vertical clearance beneath existing overhead infrastructure, enabling the safe passage of construction and maintenance vehicles without obstruction.

5.32 Within the site, the internal access track is designed to accommodate large vehicles safely, including abnormal loads, and the final arrangements would be secured through detailed design and legal agreement (Section 184/278).

5.33 The absence of footways on East Claydon Road reflects the rural character of the area; however, construction management (including banksmen and traffic management measures) will ensure the safety of pedestrians and cyclists.

Public Transport

5.34 Given the rural location and the nature of the development, the site is not reliant on public transport for day-to-day operation. Operational trips are minimal and relate to occasional maintenance visits.

Car Parking

5.35 During construction, all staff and visitor parking will be accommodated within the site, ensuring no overspill occurs on the public highway.

5.36 The CTMP requires the provision of on-site parking for all construction personnel and visitors, together with measures to ensure that vehicles do not obstruct the public highway. Once operational, parking demand associated with the development would be extremely limited and would be accommodated within the site for occasional maintenance visits, reflecting the very low level of trip generation.

Cycle Parking

5.37 Given the rural location, absence of footways, and very limited operational staffing, demand for cycle parking is negligible. However, should construction workers arrive by cycle, provision will be made within the site compound area as part of the CTMP arrangements, consistent with good practice for temporary construction facilities.

Servicing

5.38 Deliveries associated with the development will be managed through a controlled routing strategy, primarily utilising strategic and classified roads. Delivery hours will be scheduled to avoid peak traffic periods and will be secured by planning condition to minimise disruption to the local highway network.

5.39 Abnormal loads will be escorted and supported by agreed traffic management measures to ensure safe movement along the route. The Construction Traffic Management Plan (CTMP) will provide detailed provisions for routing, timing, unloading and vehicle management throughout the construction phase.

Conclusion on Highways Matters

5.40 Overall, having regard to the submitted Transport Assessment, Environmental Statement and the consultation response from the Highway Authority, the proposed development would have an acceptable impact on highway safety and the operation of the surrounding highway network. The nature of the development results in very low levels of operational traffic, with only occasional maintenance visits, and therefore the site is not dependent on regular vehicle trips. During the construction phase, impacts would be temporary in nature and would be appropriately managed through the implementation of a Construction Traffic Management Plan, which would control routing, timing of deliveries and on-site parking provision.

Safe and suitable access to the site can be achieved, with appropriate visibility splays and access geometry demonstrated and capable of being secured by planning condition. The internal access arrangements are suitable to accommodate large and abnormal vehicles, and servicing arrangements have been robustly assessed. Subject to the recommended conditions, including those relating to the CTMP and access arrangements, the proposal accords with the relevant transport policies of the Development Plan and the National Planning Policy Framework.

Raising the quality of place making and design

Vale of Aylesbury Local Plan (VALP): BE2 Design of New Development, C3 Renewable Energy

5.41 Policy BE2 of the Vale of Aylesbury Local Plan requires that development respects and complements the characteristics of the site and its surroundings, including its physical context, natural features, local distinctiveness, and the effect on public views and skylines.

5.42 In respect of criterion (a), the proposal introduces engineered infrastructure into an open rural site, which is currently characterised by agricultural land and limited built form. Whilst the layout reflects operational requirements, the scale and extent of the

development results in a form of development that does not respond positively to the prevailing rural character of the site and its surroundings.

5.43 With regard to criterion (b), the proposal comprises utilitarian structures typical of energy infrastructure, with limited architectural detailing or variation in materials. As such, the development does not reflect the proportions, detailing or materiality typically associated with the rural vernacular of the locality.

5.44 In respect of criterion (c), the development would result in the introduction of built infrastructure across a currently undeveloped site, eroding the natural qualities of the area. Whilst landscaping and planting are proposed, these would take time to mature and would not fully mitigate the perception of industrialising the landscape, particularly in the early years of operation.

5.45 In relation to criterion (d), the proposal would result in some harm from local routes and receptors, with the introduction of visible infrastructure elements within an otherwise open landscape. Whilst these effects may be reduced over time through mitigation, the development would nevertheless alter the character of views in the short to medium term.

5.46 Having regard to the above, the proposal is not considered to fully comply with Policy BE2, as it fails to sufficiently respect and complement the character, distinctiveness and visual qualities of the site and its surroundings. This conflict attracts negative weight in the overall planning balance.

Amenity of existing residents

Vale of Aylesbury Local Plan (VALP): Policy BE3 Protection of the amenity of residents

5.47 Policy BE3 of the Vale of Aylesbury Local Plan states that planning permission should not be granted where development would unreasonably harm the amenity of existing residents, and that potential adverse impacts should be eliminated or appropriately controlled through the use of planning conditions.

5.48 The application site is located within a rural area characterised by dispersed residential development. The nearest residential property is located immediately to the south of the site, beyond East Claydon Road and adjacent to the existing substation infrastructure. Further receptors include Monkomb Farm, approximately 250m to the west, and Tuckey Farm and associated buildings approximately 360m to the east of the site, beyond Claydon Brook. The pattern of development in the surrounding area is typified by isolated dwellings and farmsteads, with separation distances and intervening vegetation reducing the potential for direct impacts.

5.49 During the construction phase, there is potential for temporary disturbance arising from construction traffic, plant and general site activity. These impacts would be limited in duration and would be appropriately managed through the implementation of a Construction Traffic Management Plan and associated controls, including restrictions on construction hours, delivery periods and routing. Subject to these measures, construction

impacts are not considered to give rise to unacceptable harm to residential amenity.

5.50 Having regard to the separation distances to nearby residential receptors, the nature of the development, and the mitigation measures proposed, it is considered that the proposal would not result in adverse harm to the amenity of existing residents. Subject to appropriate conditions, the development is therefore considered to comply with Policy BE3.

Flooding and drainage

Vale of Aylesbury Local Plan (VALP): I4 Flooding

5.51 Policy I4 of the Vale of Aylesbury Local Plan, together with the National Planning Policy Framework (NPPF), requires that development is directed to areas of lowest flood risk and that it incorporates sustainable drainage systems (SuDS) to ensure flood risk is not increased elsewhere. National guidance set out in the Government's guidance on Flood risk assessment: flood zones 1, 2, 3 and 3b confirms that development located within Flood Zone 1 is at low risk of fluvial flooding, and that the primary consideration in such locations is the management of surface water and other sources of flooding.

Fluvial flood risk

5.52 The application site is located wholly within Flood Zone 1, indicating a low probability of flooding from rivers or the sea. This accords with national guidance, which identifies Flood Zone 1 as land having less than a 0.1% annual probability of fluvial flooding. As such, the site is sequentially appropriate for development in flood risk terms.

Surface water flood risk

5.53 Notwithstanding the above, the Environment Agency's Surface Water mapping identifies areas of the site as being at medium to high risk of surface water flooding. These areas are primarily associated with existing drainage ditches and the alignment of the disused railway corridor running through the site.

5.54 The submitted Flood Risk Assessment acknowledges these constraints and identifies that some mapped flood extents may be overstated where culverted features are not represented within the modelling. However, the presence of surface water flood risk across parts of the site is accepted. The proposed development responds to this by locating key infrastructure outside the highest risk areas where practicable and incorporating mitigation measures, including raising access routes by a minimum of 300mm above predicted flood levels.

5.55 The drainage strategy incorporates attenuation and controlled discharge, with calculations demonstrating that the system is capable of accommodating up to the 1 in 100 year plus 40% climate change rainfall event without flooding. The design seeks to ensure that surface water is managed on site and that runoff rates do not exceed existing greenfield conditions.

Groundwater flood risk

5.56 The Flood Risk Assessment indicates that the site is underlain by soils which are prone to seasonal waterlogging and are unsuitable for infiltration. As such, infiltration-based drainage is not proposed, and SuDS features are proposed to be lined with impermeable materials. Whilst groundwater flooding is not identified as a primary constraint, the ground conditions inform the design of the drainage system.

5.57 The Lead Local Flood Authority (LLFA) has reviewed the Flood Risk Assessment and Drainage Strategy and raises no objection to the development, subject to conditions. The LLFA confirms that the overall approach is acceptable in principle subject to a detailed drainage scheme to be secured prior to commencement, including confirmation of discharge rates, storage volumes, pipe design, water quality treatment and exceedance flow routing to ensure that any flood events are safely contained within the site.

5.58 The LLFA has also identified that further information is required to demonstrate adequate water quality treatment through the SuDS system and to ensure that runoff does not adversely affect receiving watercourses. These matters are capable of being addressed by the recommended planning conditions.

Conclusion on flood risk

5.59 Having regard to the above, the site is located within flood zone 1. Surface water flood risk has been identified as a constraint; however, the submitted Flood Risk Assessment demonstrates that this can be managed through design measures and a site-wide drainage strategy. Whilst further detail is required, the LLFA raises no objection subject to condition.

5.60 The Environment Agency has considered the application and also raises no objection to the proposal.

5.61 Subject to the imposition of conditions securing a detailed surface water drainage scheme and appropriate mitigation, the proposed development is considered capable of managing flood risk effectively without increasing flood risk elsewhere. The proposal is therefore considered to comply with Policy I4 of the Vale of Aylesbury Local Plan and the requirements of the National Planning Policy Framework.

Landscape Issues

Vale of Aylesbury Local Plan (VALP): NE4 Landscape character and locally important landscape, Policy NE8 Trees, hedgerows and Woodlands, C3 Renewable Energy, C4 Protection of public rights of way

5.62 Policy NE4 of the Vale of Aylesbury Local Plan requires that development recognises and responds positively to the individual character and distinctiveness of landscape character areas as defined within the Landscape Character Assessment. Proposals are required to have regard to the sensitivity of the receiving landscape, its contribution to a sense of place and the need to conserve and reinforce its defining characteristics. The policy requires development to minimise impacts on visual amenity, to avoid the loss of important views, and to respect local character in terms of settlement pattern, field structure, topography

and ecological value. It further requires careful consideration of scale, height, layout, colour and boundary treatments, alongside minimising lighting impacts and ensuring that development does not appear visually prominent or erode the rural qualities of the area.

5.63 Policy NE4 also establishes a clear mitigation hierarchy whereby applicants should first seek to avoid landscape harm, then reduce or mitigate it through design measures, and only as a final step consider compensatory provision. The policy states that development will be supported where appropriate mitigation to overcome any adverse impact to the character of the receiving landscape has been agreed.

5.64 The application site extends to approximately 45.3 hectares and lies within the open countryside to the north of East Claydon Road. It is located wholly within Landscape Character Area 5.6 (Claydon Valley), which is described within the Aylesbury Vale Landscape Character Assessment as a shallow, predominantly agricultural valley with a strong and coherent field pattern, limited settlement and an overall sense of openness and rural tranquillity.

5.65 The landscape is characterised by gently undulating landform transitioning into a broad and relatively flat valley floor, with higher ground to the north and south allowing for long-distance views across the valley. Tree cover is generally limited and fragmented, typically associated with hedgerows, small copses and the corridor of the disused railway line which traverses the site. The site itself comprises open agricultural fields bounded by hedgerows, and these contribute to the prevailing sense of openness and continuity of the landscape.

5.66 Whilst the existing electricity substation and associated pylons to the south of East Claydon Road are recognised as intrusive features within the wider landscape, they are locally contained and do not alter the rural and agricultural character of the valley. The Landscape Character Assessment identifies the area as being in generally good condition but of moderate sensitivity, with a stated objective to conserve and reinforce its character rather than accommodate substantial change.

5.67 The site is not nationally or locally designated.

Landscape Character

5.68 The proposed development introduces energy infrastructure into a currently undeveloped agricultural landscape. The development would involve the removal of existing vegetation and topsoil across the developed area and its replacement with extensive hardstanding, battery units, substations and associated infrastructure. The introduction of a large substation structure, together with multiple battery storage units and associated development, represents a change in land use and to the character of the receiving landscape.

5.69 The assessment presented within the Environmental Statement identifies moderate adverse effects on the local landscape character, reducing over time as mitigation planting becomes established. However, having regard to the scale of the proposed development and the extent of physical change involved, the degree of impact on the site itself and its immediate surroundings is considered to be greater than indicated. The development

would materially alter the character of part of the Claydon Valley from an open agricultural landscape to one dominated by energy infrastructure, resulting in a noticeable change in character at both the site level and local landscape level.

5.70 The proposed mitigation includes the creation of a large earth bund and extensive planting, which is intended to provide screening and integrate the development into the landscape. Whilst this planting may reduce the visual effects over time, the bund itself is not a characteristic feature of this landscape and represents an artificial landform introduced to mitigate the impact of the development. Similarly, the introduction of significant woodland planting within an area characterised by limited and dispersed tree cover would alter the prevailing landscape structure, resulting in a landscape that differs from the established pattern described in the Landscape Character Assessment.

5.71 Overall, the proposal would not fully respect the existing landscape character and would conflict with the objective of conserving and reinforcing the characteristics of the Claydon Valley.

Visual impacts

5.72 The site is visible from a number of receptors including nearby residential properties, public rights of way, local roads and longer-distance viewpoints from the surrounding valley sides.

5.73 The Monkomb Farm complex, located immediately to the west of the site on rising ground, is identified as the primary sensitive residential receptor. The properties have elevated views across the site and are specifically assessed in the Environmental Statement as experiencing major–moderate adverse effects at Year 1, reducing over time as planting establishes.

5.74 The dwelling adjacent to the substation to the south of the site, commonly referred to as Station House, would also experience visibility of the development, particularly during the construction phase and in relation to the access works and haul route.

5.75 To the east of the site, Tuckey Farm and associated buildings lie on the valley floor beyond Claydon Brook. Views from these properties are more limited due to intervening vegetation and topography, but elements of the development would be visible, particularly in early years and in winter conditions.

5.76 More widely, the LVIA and landscape comments confirm that there is potential for visibility from properties on the edges of Winslow, East Claydon and Granborough, where dwellings are located on higher ground overlooking the valley. In particular, receptors on the western edge of Winslow and elevated parts of East Claydon have the potential to experience long-distance views of the substation and upper parts of the development, especially in winter when vegetation is not in leaf.

5.77 Properties around Verney Junction, located at lower elevations to the north-west of the site, may also experience views towards the northern extent of the development where they back onto open countryside, albeit these views are more filtered.

5.78 Although there are no public rights of way within the site itself, several PRoWs within the surrounding area would be affected by the development.

5.79 The most sensitive PROW receptor is Bridleway BM ECL/2/1, which runs along the western side of the site descending from Sandhill Road. From this elevated route, users would experience open views of both the BESS areas and the substation, particularly during construction and early operation.

5.80 Footpath BM ECL/4/1, located along the ridgeline to the south-west, also provides elevated viewpoints from which the site is visible within the wider valley context. Similarly, Bridleway BM ECL/5/1, providing a connection to East Claydon, allows partial views depending on position and vegetation.

5.81 To the east, Footpath BM WIS/1/1, which runs north–south through Tuckey Farm, enables views across Claydon Brook toward the site, particularly in the midground range.

5.82 The wider long-distance recreational network is also relevant. The site is visible from sections of the Midshires Way / North Buckinghamshire Way, which include parts of Bridleways ECL/2/1 and ECL/5/1.

Cumulative effects

5.83 The site is located within an area where a number of other large-scale energy infrastructure projects are either consented or proposed, including Tuckey Solar Farm, Rosefield Solar Farm and other associated developments. These schemes are located within or adjacent to the same landscape character area and, in some instances, share visual relationships with the application site.

5.84 The cumulative assessment identifies that the combined effect of these developments would range from moderate adverse to major–moderate adverse for certain receptors, with significant effects arising in some views. In particular, the proximity of Tuckey Solar Farm and the scale of the proposed Rosefield Solar Farm are identified as key contributors to cumulative landscape change.

5.85 When considered together, these developments represent an intensification of energy infrastructure within the Claydon Valley. Whilst individual schemes may be capable of mitigation in isolation, their combined effect results in a significant change in landscape character, with parts of the valley increasingly experienced as an energy landscape rather than a predominantly agricultural one. This cumulative effect is particularly relevant in views from elevated locations and along key routes where multiple developments may be experienced either within the same view or in succession.

5.86 The cumulative impact therefore materially increases the magnitude of change and reinforces the conclusion that the proposal would contribute to the erosion of landscape character within LCA 5.6.

Conclusion of landscape effects

5.87 Having regard to the baseline landscape character, the nature and scale of the proposed development, and the findings of the Landscape and Visual Impact Assessment, it is

considered that the proposal would result in a harmful change to the character of the Claydon Valley. The development would introduce built form and engineered structures into a currently open and predominantly agricultural landscape, resulting in adverse effects on both landscape character and visual amenity.

5.88 Whilst mitigation is proposed, including bunding and planting, this does not fully overcome the scale of change that would be experienced by the receiving landscape, nor does it avoid harm in accordance with the mitigation hierarchy.

5.89 The proposal would contribute to cumulative landscape change within the Claydon Valley, when considered alongside other proposed and consented energy schemes, resulting in a broader transformation of the landscape.

5.90 Accordingly, the proposal is not considered to fully comply with Policy NE4 of the Vale of Aylesbury Local Plan, and this conflict attracts negative weight in the overall planning balance.

Ecology

Vale of Aylesbury Local Plan (VALP): NE1 Biodiversity and geodiversity, NE8 Trees Hedgerow and woodland, C3 Renewable Energy Supplementary Planning Document: Biodiversity Net Gain

5.91 In terms of biodiversity and ecology, Local Planning Authorities have a Statutory Duty to ensure that the impact of development on wildlife is fully considered during the determination of a planning application under the Wildlife and Countryside Act 1981 (as amended), Natural Environment and Rural Communities Act 2006, the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations 2010). The statutory framework for BNG was introduced by Schedule 7A of the Town and Country Planning Act 1990, which was inserted by Schedule 14 of the Environment Act 2021. This framework requires developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

5.92 Policy NE1 of the Vale of Aylesbury Local Plan seeks the protection and enhancement of biodiversity and geodiversity. The policy requires development to avoid harm in the first instance, and where impacts cannot be avoided, to apply the mitigation hierarchy of avoidance, mitigation and, as a last resort, compensation. Development will not be permitted where significant harm cannot be adequately mitigated or compensated, and a measurable net gain in biodiversity must be achieved.

5.93 The policy also requires that sufficient ecological information is provided to enable the Local Planning Authority to properly assess impacts, that surveys are undertaken to an appropriate standard, and that where there is a reasonable likelihood of protected or priority species being present, development must demonstrate that adverse impacts can be avoided or appropriately mitigated prior to determination.

5.94 The application is supported by an Environmental Statement and subsequent addendum, together with ecological assessments and a Biodiversity Net Gain (BNG) metric. These identify that the Site comprises predominantly arable and improved grassland habitats,

with ecological features including hedgerows, woodland belts (including the former railway embankment), and field ditches.

5.95 Protected and notable species identified or considered include breeding birds (including skylark and yellowhammer), bats (including Myotis and Barbastelle), badger, and the potential for invertebrate species associated with hedgerows.

5.96 The proposed development would result in the loss of sections of agricultural land and some vegetation within the application site, together with changes in land use from agricultural to energy infrastructure. This would give rise to a degree of habitat loss and fragmentation at the site level.

5.97 However, the majority of affected habitats are of relatively low ecological value, and the overall impact on habitats is moderated by the retention of existing boundary features, including hedgerows and watercourses, which are key to maintaining ecological connectivity. The spatial arrangement of the development retains undeveloped margins and buffer zones, which reduces the extent of habitat loss and provides opportunities for biodiversity enhancement.

5.98 In relation to species, there is potential for temporary disturbance during the construction phase, for example to nesting birds or other fauna present within retained vegetation.

5.99 In response to the Ecologist's comments, the applicant submitted a detailed rebuttal supported by additional ecological information. The applicant maintains that the scope and extent of survey work were agreed through the EIA scoping process and are proportionate to the nature and characteristics of the Site, and that further survey effort, including additional breeding bird surveys beyond a single visit, is not necessary given the anticipated level of impact. It is asserted that the Site is of generally low ecological value, comprising predominantly intensively managed agricultural land, and that key habitats used by species such as yellowhammer are to be retained, with proposals for habitat creation expected to enhance foraging opportunities.

5.100 The applicant notes that impacts on bats are limited, with the Site characterised as having low suitability, and that any potential lighting effects would be appropriately mitigated. In respect of biodiversity net gain, it is put forward that this can be achieved through a combination of habitat creation and enhancement measures, including the provision of grassland, strengthened hedgerow networks and ecological buffers.

5.101 The proposed development incorporates a range of embedded mitigation measures, including the retention of existing hedgerows and ecological buffers, which will minimise impacts on habitats and species. Construction-phase measures would be secured to ensure that potential effects on protected species, such as nesting birds, are appropriately managed.

5.102 In addition, the proposal includes opportunities for habitat enhancement through landscaping and habitat creation, including planting, grassland management and the strengthening of boundary features. These measures would contribute to improvements in ecological resilience and the overall biodiversity value of the site.

5.103 Following the submission of further information, including an Environmental Statement Addendum and an updated Biodiversity Net Gain (BNG) assessment, the Council's Ecologist has reviewed the revised material. The most recent consultation response confirms that the updated ecological assessments and supporting information are now sufficient to inform the determination of the application. The Ecologist is satisfied that the Site's ecological baseline and the likely impacts of the development have been appropriately characterised, and that suitable mitigation, compensation and enhancement measures are proposed. The response further concludes that biodiversity net gain can be achieved on-site and would exceed the minimum 10% which includes with approximately 58% habitat uplift and over 10% hedgerow gain, which exceeds both the national and local policy requirements.

5.104 It is also confirmed that remaining matters, including construction-related impacts, lighting impacts and long-term habitat management, can be adequately secured through the use of planning conditions.

5.105 The proposed development would result in some localised loss of predominantly low-value habitats. However, this harm is limited in scale and is capable of being mitigated through the retention of key ecological features, the implementation of construction controls and the provision of habitat enhancement measures. Subject to the imposition of appropriate planning conditions, including those securing ecological mitigation and long-term management, the proposal would not result in unacceptable harm to biodiversity.

5.106 The Council's Great Crested Newt (GCN) Officer has reviewed the submitted information and raises no objection to the proposed development subject to conditions. Further information submitted during the application process demonstrates that great crested newts are unlikely to be present within the on-site wet ditch, addressing earlier concerns regarding its suitability to support the species. On this basis and having regard to the site context and available survey evidence, it is considered that the proposed development would not give rise to an unacceptable impact on great crested newts, subject to appropriate safeguards.

5.107 Notwithstanding this conclusion, a precautionary approach is required. A planning condition is therefore recommended to secure a non-licensed method statement for amphibians, including great crested newts, to be submitted and approved prior to commencement of development. This will ensure that reasonable avoidance measures are implemented during construction, including appropriate working practices and procedures should protected species be encountered. Subject to this condition, the proposal would comply with relevant wildlife legislation, including the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, and would accord with policy requirements to conserve and enhance biodiversity.

5.108 On this basis, the Council's Ecologist has recommended appropriate planning conditions. These include requirements for the implementation of ecological mitigation measures, the preparation and adherence to a Construction Environmental Management Plan (CEMP), Landscape Ecological Management Plan (LEMP) and the submission of a detailed lighting

strategy to safeguard nocturnal species. In addition, conditions are recommended to secure the submission of a Biodiversity Net Gain Plan and a Habitat Management and Monitoring Plan (HMMP), alongside provision for off-site compensation for skylark, also to be secured by a planning condition.

Arboricultural Impact

Vale of Aylesbury Local Plan (VALP): Policy NE8 Trees, Hedgerows and Woodland

5.109 Policy NE8 of the Vale of Aylesbury Local Plan seeks to protect and enhance the district's tree and woodland resource. Development proposals are required to retain trees, hedgerows and woodland where they contribute to the character and amenity of the area, and to avoid harm to important arboricultural features. Where development may affect trees, a survey and arboricultural impact assessment in accordance with BS 5837 is required, with any necessary protection measures secured by condition.

5.110 The policy also requires that development does not result in the loss of important arboricultural features unless this can be justified, and that appropriate replacement planting and buffers are provided where loss is unavoidable. The retention of hedgerows and tree belts, together with the maintenance of ecological buffers, is an important consideration in minimising impacts.

5.111 The application site comprises agricultural land containing hedgerows, field boundary vegetation and a notable tree belt associated with the former railway corridor, which forms a linear feature through the site. There are no TPOs affecting the site.

5.112 The application is supported by a Tree Survey and Arboricultural Impact Assessment, together with a Tree Protection Plan (TPP) prepared in accordance with BS 5837. Additional technical information has been submitted in response to earlier comments from the Council's Arboricultural Officer.

5.113 The principal arboricultural impact arises from the proposed upgrade of the existing access track within the former railway corridor. The works include raising the track by approximately 300mm and limited widening to accommodate passing bays.

5.114 The submitted information demonstrates that the majority of the works would be contained within the footprint of the existing track, thereby reducing the extent of encroachment into Root Protection Areas (RPAs). Where widening is required, this would be undertaken using engineering solutions, including cellular confinement systems, to limit ground disturbance and loading on root-bearing soils.

5.115 In locations where trees are in close proximity to the edge of the track, the use of timber sleeper edging is proposed in place of conventional excavated kerbing, thereby avoiding trenching within RPAs. These measures are supported in principle as a means of reducing potential impacts on retained trees.

5.116 Some limited tree removal is proposed to facilitate passing bays; however, this relates to lower quality trees and does not materially affect the integrity of the wider tree belt, which would be retained.

5.117 On this basis, the submitted information demonstrates that the proposed development can be accommodated without resulting in significant harm to existing trees, subject to appropriate safeguards.

5.118 The Council's Arboricultural Officer confirms that the amended information has addressed the principal concerns regarding the feasibility of the access track and the relationship of development to retained trees. The revised Tree Protection Plan now clearly identifies Root Protection Areas and improves the understanding of constraints across the site.

5.119 However, further detail is required to ensure that retained trees are adequately protected during construction. It is therefore recommended that a pre-commencement condition be imposed requiring the submission of a detailed Arboricultural Method Statement (AMS) and updated Tree Protection Plan. This will ensure that appropriate protection measures, construction techniques, supervision and monitoring are secured in accordance with BS 5837 and best practice.

5.120 Subject to the inclusion of appropriate planning conditions securing a detailed Arboricultural Method Statement and Tree Protection Plan, the proposed development is not considered to result in unacceptable harm to trees, hedgerows or woodland. The proposal is therefore considered to comply with Policy NE8 of the Vale of Aylesbury Local Plan.

Historic environment (or Conservation Area or Listed Building Issues)

Vale of Aylesbury Local Plan (VALP): BE1 (Heritage Assets), Policy C3 Renewable Energy

5.121 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority, when considering whether to grant planning permission for development affecting the setting of a listed building, to have special regard to the desirability of preserving its setting. This statutory duty applies irrespective of the level of harm identified and is a matter of considerable importance and weight in decision-making.

5.122 National policy set out in Section 16 of the National Planning Policy Framework (2024) confirms that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraphs 201 and 208 require decision-makers to identify the contribution of setting to significance and to weigh any less than substantial harm against the public benefits of the proposal, giving great weight to the conservation of heritage assets.

5.123 Policy BE1 of the VALP (2021) seeks to conserve heritage assets in a manner appropriate to their significance, including their setting. It requires development proposals that cause less than substantial harm to a designated heritage asset to weigh the level of harm against the public benefits that may be gained by the proposal, including securing its optimum viable use.

5.124 Insofar as is relevant here, Policy C3 of the VALP states planning applications involving renewable energy development will be encouraged provided they do not result in any unacceptable adverse impacts, including cumulative impact, on the historic environment including designated and non-designated assets and their settings.

5.125 Guidance provided by Historic England, including GPA3 on The Setting of Heritage Assets, confirms that setting is not solely defined by visual considerations and that harm may arise through changes to the character and function of the surroundings, even where intervisibility is limited.

5.126 The application site comprises agricultural land within open countryside and does not contain any designated heritage assets within its boundary.

5.127 The nearest designated heritage asset is the Grade II listed Tuckey Farmhouse, located approximately 420m to the east of the site boundary. A further group of listed buildings is located within East Claydon village, approximately 690m to the south-west, representing the nearest concentration of designated heritage assets.

5.128 The site lies within a rural agricultural landscape which contributes to the wider setting of these heritage assets. In particular, the significance of farmsteads such as Tuckey Farmhouse is informed in part by their relationship with the surrounding agricultural land and their rural context.

5.129 The mature vegetation and the physical separation between the site and Tuckey Farmhouse limits intervisibility. The effects on the wider group of listed buildings within East Claydon would be limited due to distance and the presence of intervening features, and that these assets would not experience meaningful change in their setting as a result of the development.

5.130 Notwithstanding this, it is recognised that the proposal would introduce large-scale energy infrastructure into a currently agricultural landscape, resulting in a degree of change to the character of the wider setting of nearby heritage assets. In particular, the surrounding landscape would become more strongly influenced by energy infrastructure, rather than being defined solely by agricultural use.

5.131 This change has the potential to erode, to a limited degree, the contribution that the open agricultural landscape makes to the significance of Tuckey Farmhouse and other assets. However, the extent of this change is moderated by the separation distance between the site and the heritage assets, the presence of intervening vegetation and landform, and the influence of existing infrastructure within the wider landscape, including pylons and the adjacent substation.

5.132 Taking these factors into account, the proposal would result in less than substantial harm, at the lower end of that spectrum, to the significance of nearby heritage assets through change to their wider setting.

5.133 In accordance with Section 66(1) of the 1990 Act and paragraph 208 of the NPPF, this harm attracts great weight in the planning balance and shall be weighed against the public benefits of the proposal.

Archaeology

Vale of Aylesbury Local Plan (VALP): BE1 (Heritage Assets), Policy C3 Renewable Energy

5.134 Policy BE1 of the Vale of Aylesbury Local Plan and Section 16 of the National Planning

Policy Framework (2024) require that the significance of archaeological assets is properly understood and taken into account in decision-making. Paragraphs 205 to 209 of the NPPF require developers to describe the significance of any heritage assets affected, including any contribution made by their setting, and to ensure that the potential for unknown archaeological remains is appropriately assessed. Where development would impact archaeological remains, the preferred approach is to preserve them in situ; where this is not possible, appropriate investigation, recording and mitigation should be secured.

5.135 The application site lies within an area of known archaeological potential, and evidence submitted as part of the Environmental Statement, including geophysical survey and trial trenching, confirms the presence of archaeological remains within the site associated with Romano-British activity and the historic use of the wider landscape.

5.136 The submitted assessment identifies that ground disturbance associated with the proposed development, including works for foundations, access tracks, cabling, drainage infrastructure and landscaping, has the potential to impact any below-ground archaeological remains. However, the precise extent, nature and significance of any such remains within the site is not fully established at this stage.

5.137 The Archaeological Officer does not object to the proposal in principle but recommends that any grant of planning permission is subject to a condition requiring the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation. This approach is consistent with the NPPF, which recognises that where preservation in situ is not feasible, archaeological interest can be appropriately mitigated through preservation by record.

5.138 The nature of the development allows for a phased programme of investigation and mitigation, and the requirement for a Written Scheme of Investigation would ensure that any archaeological remains affected by the development would be properly recorded and their significance preserved in accordance with best practice.

5.139 The proposed development could result in harm to below-ground archaeological remains. However, this impact can be appropriately mitigated through a programme of archaeological investigation, recording and publication secured by planning condition.

5.140 Subject to the recommended condition requiring the submission and implementation of a Written Scheme of Investigation, the proposal is considered to comply with Policy BE1 of the Vale of Aylesbury Local Plan and the archaeological requirements of the National Planning Policy Framework. Neutral weight is attributed to this in the planning balance.

Environmental Effects

Vale of Aylesbury Local Plan (VALP): Policy NE5 Pollution, Air Quality and Contaminated Land; Policy C3 Renewable Energy

Noise

5.141 Policy NE5 of the Vale of Aylesbury Local Plan requires that development minimises noise

impacts on neighbouring properties and the wider environment, and that noise-generating development will only be permitted where appropriate mitigation measures are incorporated to reduce impacts to acceptable levels.

5.142 The site is located within a rural environment with no major roads or industrial uses in close proximity. Existing noise levels are therefore generally low and characterised by natural sounds such as birdsong, wind in vegetation, and occasional agricultural or traffic noise.

5.143 The nearest noise sensitive receptors are dispersed residential properties including Tuckey Farm, Tuckey Barn, Monkomb Farm and Station House, all of which are sensitive to changes in background noise levels.

Construction Noise

5.144 Construction activities would give rise to temporary noise associated with plant, machinery and construction traffic over a period of approximately 24 months.

5.145 The Environmental Statement identifies that noise effects would be short-term and controlled through restriction to daytime working hours and implementation of good practice measures.

Operational Noise

5.146 Operational noise would arise from fixed plant, primarily the cooling systems associated with the battery units, together with inverters, transformers and synchronous compensator equipment. The Environmental Health Officer confirms that, having regard to the low baseline noise environment in this rural location, there is potential for significant noise impact at nearby residential receptors, particularly during the night-time period. Properties including Tuckey Farm, Tuckey Barn and Monkomb Farm are identified as being at greatest risk.

5.147 The submitted noise assessment, undertaken in accordance with BS 4142, identifies that without mitigation, noise effects during the daytime would generally be low; however, night-time impacts could be adverse or significant, with the potential for exceedances at sensitive receptors. Environmental Health confirm that they are in broad agreement with these findings and accept that mitigation is required to ensure impacts are reduced to an acceptable level. In EIA terms, this equates to a moderate to minor adverse effect which is significant prior to the implementation of mitigation.

5.148 The scheme incorporates both embedded and additional mitigation measures to address these impacts. Embedded mitigation includes the siting of the compound to maximise separation from residential receptors, together with the use of acoustic bunding and site topography to provide screening. Environmental Health advise that further mitigation should be secured by condition, including the provision of a 4 metre high acoustic fence to the south-east of the compound, a 5 metre high earth bund to the south-west, and the careful selection of plant and equipment based on sound power levels to ensure that noise impacts at receptors are appropriately controlled. These measures align with those identified within the Environmental Statement and are considered necessary to reduce

impacts to acceptable levels.

5.149 The noise assessment demonstrates that, with the implementation of the identified mitigation measures and appropriate plant selection, predicted noise levels would reduce such that impacts at nearby receptors would be low in both daytime and night-time periods. As such, the impact of operational noise can be mitigated for.

External Lighting

5.150 The development also introduces new lighting associated with security and maintenance; however, this would be limited in frequency and duration, with lighting only activated when staff are present. A detailed lighting scheme can be secured by condition to ensure that light spill and glare are minimised and do not materially affect nearby properties.

Air Quality

5.151 The proposed development is not a source of operational air pollution, as it does not involve combustion processes or ongoing emissions to air. Once operational, the site would be unmanned and would generate only minimal vehicle movements associated with periodic maintenance, and these would not materially affect local air quality.

5.152 During the construction phase, there is potential for temporary impacts associated with dust generation and emissions from construction traffic and plant. However, these effects would be short-term and can be effectively controlled through standard best practice measures secured through a Construction Environmental Management Plan (CEMP), including dust suppression and appropriate site management.

5.153 Taking into account the temporary and controllable nature of construction effects, together with the absence of operational emissions, the development would not give rise to unacceptable impacts on air quality. The proposal is therefore considered to comply with Policy NE5 of the Vale of Aylesbury Local Plan in this regard.

Contaminated Land

5.154 The application is supported by a Phase 1 Geo-environmental Desk Study, which assesses the potential for contamination based on the current and historic use of the site. The site is currently in agricultural use and has no significant history of contaminative land uses.

5.155 The assessment concludes that the risk of contamination is generally low, with no unacceptable risks identified to human health, controlled waters or ecological receptors. Any potential risks associated with ground conditions or unidentified contamination are considered capable of being managed through standard construction practices and mitigation.

5.156 In the event that unexpected contamination is encountered during construction, appropriate measures can be secured through a condition requiring further investigation and, where necessary, remediation to ensure the site is safe for its proposed use.

Conclusion on Environmental Effects

5.157 The proposed development has the potential to give rise to significant operational noise effects in the absence of mitigation, particularly during the night-time period at nearby residential receptors.

5.158 However, both the Environmental Statement and the Environmental Health Officer confirm that these impacts can be satisfactorily mitigated through the implementation of acoustic barriers, bunding and appropriate selection of plant and equipment, secured by planning condition.

5.159 Subject to these measures being secured by way of a condition, the developments impact on residential amenity is acceptable and complies with Policy NE5 of the Vale of Aylesbury Local Plan.

Fire Risk

5.160 Policy NE5 of the Vale of Aylesbury Local Plan requires that development should not give rise to unacceptable risks to public safety and that potential hazards are appropriately mitigated. Whilst fire safety is primarily regulated through separate legislative regimes, including the Regulatory Reform (Fire Safety) Order 2005 and Building Regulations, it remains a material planning consideration where it has the potential to affect land use, public safety or the surrounding environment.

5.161 There is no single statutory standard specifically governing fire safety at the planning stage for Battery Energy Storage Systems (BESS). However, national guidance, including the National Fire Chiefs Council (NFCC) guidance for grid-scale BESS (2023), together with recognised international standards such as NFPA 855 and UL 9540A, form the accepted basis for assessing such developments.

5.162 The proposed development includes the installation of large-scale battery energy storage infrastructure, which inherently presents a risk of fire associated with battery failure and thermal runaway. The applicant has submitted a detailed Fire Safety Strategy prepared by DNV, supported by an independent review undertaken by Risk and Safety Plus.

5.163 The Fire Safety Strategy identifies that the design of the development seeks to minimise the likelihood of fire events and their consequences through a range of embedded safety systems. These include the use of battery management systems to monitor and control performance, fire detection and suppression systems within battery containers, and design measures to prevent fire propagation between units.

5.164 The strategy confirms that battery units would be spaced and arranged based on evidence from fire propagation testing (including UL 9540A and large-scale fire testing), such that thermal runaway events would not spread between adjacent units. In addition, the layout ensures separation distances from site boundaries and surrounding land uses in line with NFCC guidance, together with the removal of combustible vegetation in proximity to equipment.

5.165 The design also incorporates emergency response considerations, including provision of site-wide access for fire and rescue vehicles, unobstructed internal roadways, and a comprehensive Emergency Response Plan to be developed in consultation with

Buckinghamshire Fire and Rescue Service. Pre-application engagement has taken place with the Fire and Rescue Service, which raised no objection to the principle of the development subject to ongoing consultation.

5.166 The submitted documentation confirms that the site will be equipped with dedicated firewater supply via underground storage tanks capable of delivering 1,900 litres per minute over a two-hour period, consistent with NFCC guidance. This provision is intended to support defensive firefighting operations, primarily focused on preventing fire spread to adjacent infrastructure.

5.167 In the event of a fire, the adopted firefighting strategy would primarily involve controlled burn techniques, with firewater used for boundary cooling rather than direct extinguishment in accordance with current industry practice and NFCC guidance.

5.168 The design also incorporates measures to prevent environmental harm, including a sustainable drainage system to capture and contain any contaminated firewater runoff within the site.

5.169 A plume dispersion study has been undertaken using Computational Fluid Dynamics (CFD) modelling to assess a reasonable worst-case fire scenario associated with the proposed BESS.

5.170 The modelling demonstrates that thermal effects, smoke, and the dispersion of toxic gases would remain confined to the immediate vicinity of the affected BESS unit. Importantly, recognised thresholds for harm, including Immediately Dangerous to Life or Health (IDLH) levels, would not be exceeded beyond the site boundary under any of the modelled scenarios. As such, the assessment concludes that there would be no significant effects on nearby roads or residential receptors.

5.171 By way of context, the nearest road junction and residential properties located approximately 54 metres and 300 metres from the BESS units respectively are confirmed to fall outside the identified zone of impact. This further supports the conclusion that the development would not give rise to off-site risks to public safety or amenity.

Independent Review

5.172 An independent review of the submitted Fire Safety Strategy has been undertaken on behalf of the Local Planning Authority by Risk and Safety Plus (RS+), a specialist fire safety and risk management consultancy operating as part of the Ethical Fire Safety and Risk Management Group. The review was commissioned specifically to assess the adequacy of the applicant's fire safety documentation at the planning stage, including the Fire Safety Strategy and associated plume dispersion study, and to consider whether the submitted information aligns with relevant planning policy, national guidance and industry best practice.

5.173 The independent review concludes that the Fire Safety Strategy is comprehensive, appropriately structured and tailored to the specific risks associated with a grid-scale battery energy storage system. It confirms that the proposed development has been designed in accordance with the National Fire Chiefs Council (NFCC) guidance for BESS

developments, as well as recognised international standards, and incorporates a range of embedded safety measures including fire detection, suppression systems, appropriate spatial separation of units, provision of firewater and suitable emergency access arrangements.

5.174 The review also confirms that the accompanying plume dispersion modelling adopts a conservative worst-case scenario and demonstrates that the effects of a battery fire, including heat, smoke and toxic gases, would be contained within the site and would not give rise to off-site impacts to nearby receptors. In overall terms, the independent assessor concludes that the submitted information is suitable and sufficient for the purposes of determining the application, and that the fire safety measures proposed provide an appropriate level of assurance that risks have been reduced to an acceptable level at the planning stage.

5.175 Buckinghamshire Fire and Rescue Service have been consulted on the application and raise no objection in principle to the proposed development.

5.176 The Fire and Rescue Service further advise that the mitigation strategy should clearly set out the measures embedded within the design, construction and operation of the development to minimise fire risk and ensure alignment with relevant legislation and recognised guidance. The Emergency Response Plan should establish appropriate procedures in the event of a fire, including system isolation, communication protocols, access arrangements for emergency services and measures to support firefighting operations such as cooling, boundary protection and sustained intervention. In addition, the applicant is advised to address the management of toxic, flammable and explosive gases, the containment of firewater run-off, and the safe handling and disposal of damaged batteries, together with a commitment to ongoing engagement with the Fire and Rescue Service throughout the lifecycle of the development.

5.177 These matters are addressed within the submitted Fire Safety Strategy and supporting documentation and can be secured and further detailed through planning conditions, including the preparation of a detailed Emergency Response Plan and ongoing liaison with Buckinghamshire Fire and Rescue Service.

Conclusion of Fire Risk

5.178 Overall, the proposed development introduces a use which carries an inherent risk of fire associated with battery energy storage systems. However, the application is supported by a comprehensive Fire Safety Strategy, detailed plume dispersion modelling and an independent review commissioned by the Local Planning Authority. These demonstrate that the risk has been appropriately assessed and that a robust, evidence-based approach has been taken to minimise both the likelihood of a fire event and its potential consequences.

5.179 The independent review confirms that the submitted information is suitable and sufficient for planning purposes and accords with NFCC guidance and recognised industry standards. In addition, Buckinghamshire Fire and Rescue Service raise no objection in principle,

subject to the preparation of a Fire Risk Reduction and Mitigation Strategy and a detailed Emergency Response Plan, together with ongoing engagement. The submitted plume dispersion modelling, based on conservative assumptions, further demonstrates that the effects of a worst-case fire scenario, including heat, smoke and toxic gases, would be contained within the site and would not give rise to significant effects at nearby residential properties or the wider highway network.

5.180 Taking these factors into account, the applicant has demonstrated that fire risk can be adequately managed through the design, layout and operation of the development, together with the imposition of appropriate planning conditions. Subject to these measures, the proposal would not result in unacceptable risk to public safety or the surrounding environment.

Agricultural Land

Vale of Aylesbury Local Plan (VALP): Policy NE7 Best and Most Versatile Agricultural Land;

5.181 Policy NE7 of the Vale of Aylesbury Local Plan seeks to protect Best and Most Versatile (BMV) agricultural land, defined as Grades 1, 2 and 3a, and requires proposals involving agricultural land to be supported by an Agricultural Land Classification (ALC) assessment. Where development would result in the loss of BMV land, permission will only be granted where there are no suitable alternative sites of poorer quality land and where the benefits of the proposal outweigh the harm arising from that loss.

5.182 The application is supported by an Agricultural Land Classification assessment which identifies that the site comprises predominantly Grade 3b agricultural land. This classification falls outside the definition of BMV land, and the site is therefore considered to be of moderate to poor agricultural quality in policy terms. On this basis, the proposal would not result in the loss of Best and Most Versatile agricultural land and the main policy protections under Policy NE7 do not directly apply.

5.183 In the absence of any loss of BMV land, there is no requirement to demonstrate that alternative sites of poorer quality are unavailable. Nevertheless, it is recognised that the proposal has locational requirements, including proximity to grid infrastructure, which limits the range of suitable sites. This further supports the acceptability of the site selection in agricultural land terms.

5.184 Taking these factors into account, the proposal would not conflict with the objectives of Policy NE7.

Minerals Safeguarding

Policy 1 Safeguarding of Mineral Resources; Buckinghamshire Minerals and Waste Local Plan

5.185 Policy 1 of the Buckinghamshire Minerals and Waste Local Plan seeks to safeguard mineral resources of local and national importance from unnecessary sterilisation by non-mineral development. The application site lies within a designated Mineral Safeguarding Area (MSA) for sand and gravel, reflecting the presence of underlying mineral resources within

this part of the county. As such, the requirements of Policy 1 are engaged.

5.186 The policy requires that development proposals within an MSA demonstrate that one of the following applies: that prior extraction of the mineral resource is practicable and environmentally feasible; that the mineral is not of value; that the development is temporary and restoration would not inhibit future extraction; or that there is an overriding need for the development.

5.187 In this case, the proposed development would result in the sterilisation of the mineral resource for the duration of its operational life. However, the proposal is temporary in nature and incorporates provision for decommissioning and restoration of the land following the cessation of use. The development is predominantly surface-based and does not involve substantial excavation across the entirety of the site. As such, there remains potential for the underlying mineral resource to be accessed in the future, within the likely timescale that the resource may be required.

5.188 With regard to prior extraction, there is no evidence before the Local Planning Authority to suggest that mineral extraction on the site would be practicable or viable, having regard to the scale of the development, site configuration, and the locational and operational requirements of the proposed energy infrastructure. The development also has specific locational requirements, including proximity to the electricity grid infrastructure, which significantly limit the availability of alternative sites outside the MSA.

5.189 Taking these factors into account, it is considered that the proposal satisfies the requirements of Policy 1, in that the development is temporary and would not prevent the future extraction of the mineral resource. Furthermore, the proposal delivers nationally significant energy infrastructure benefits, which provide additional justification in terms of the policy tests.

5.190 Accordingly, the proposal would not result in the unnecessary sterilisation of mineral resources and is considered to comply with Policy 1 of the Buckinghamshire Minerals and Waste Local Plan.

Other Matters

East West Rail Safeguarding

5.191 East West Railway Company Limited (EWR Co) has been re-consulted on the application under the Safeguarding Directions that came into force on 14 November 2024.

5.192 The application site falls within land safeguarded for the East West Rail project, and accordingly the Local Planning Authority has had regard to the requirements of the Safeguarding Directions. These Directions are intended to protect land required for future railway infrastructure from development that could prejudice its delivery.

5.193 In its previous consultation response dated 13 June 2025, EWR Co identified a potential interface between the proposal and safeguarded land associated with a utility connection between the railway corridor and East Claydon substation. On that basis, EWR Co did not object to the development but requested that a condition be imposed to ensure that the

proposal would not conflict with or prejudice the delivery of East West Rail.

5.194 However, EWR Co has since provided an updated consultation response reflecting ongoing design development of the East West Rail project. This confirms that the current proposals now adopt a system of discontinuous electrification, meaning that overhead line infrastructure is no longer required along the section of route within which the application site is located. As a result, the previously identified requirement for a utility connection between the railway and East Claydon substation is no longer necessary.

5.195 On this basis, EWR Co now confirms that there is no longer any likely interface between the safeguarded land required for the East West Rail project and the proposed development. Consequently, EWR Co raises no objections to the application and confirms that the condition previously suggested is no longer required.

5.196 EWR Co has also confirmed that safeguarding requirements will continue to evolve as the design progresses and that updated Safeguarding Directions are expected. Notwithstanding this, the current position is that the proposed development would not conflict with, or prejudice, the delivery of the East West Rail project.

5.197 Having regard to the updated consultation response, it is considered that the proposal complies with the requirements of the East West Rail Safeguarding Directions and would not prejudice the implementation of the East West Rail project. No objection is therefore raised on safeguarding grounds.

Overhead power lines

5.198 Overhead power lines cross the site. No comment to this matter has been made by either National Grid or the Distribution Network Operator.

Cumulative Effects

5.199 The Environmental Statement includes an assessment of cumulative effects, considering the proposed development alongside other existing, consented and emerging schemes within the surrounding area. These include energy infrastructure and other relevant developments identified through the EIA process and consultation, including solar farms, battery energy storage proposals and the East West Rail project. A number of these schemes, including development at Tuckey Farm, Rookery Farm, Wings Farm and the Rosefield Solar Farm proposal, are described further within the planning history section of this report.

5.200 Cumulative effects have been assessed across relevant environmental topics, including landscape and visual impact, transport, noise, ecology and heritage. The assessment adopts a precautionary approach, taking into account both committed developments and, where appropriate, reasonably foreseeable schemes, to consider a realistic worst-case scenario.

5.201 The site is located within an area influenced by the presence of existing and proposed infrastructure, notably associated with the East Claydon substation and the wider electricity transmission network. This forms part of the baseline against which cumulative

effects have been assessed, particularly in relation to landscape character and visual amenity.

5.202 The most notable cumulative effects arise in relation to landscape and visual impact. The combined presence of multiple energy infrastructure developments, including nearby solar and energy storage schemes, has the potential to increase the magnitude of change in certain views, particularly from nearby public rights of way.

5.203 In respect of other environmental topics, including transport, noise and ecology, the Environmental Statement identifies no significant cumulative effects. Operational traffic associated with the development would be limited and would not materially add to cumulative traffic flows. Similarly, with appropriate mitigation in place, no significant cumulative noise effects are identified.

5.204 In relation to heritage, no significant cumulative effects on designated heritage assets are identified, having regard to the distance between schemes, intervening landform and vegetation, and limited intervisibility.

5.205 Overall, cumulative landscape and visual effects have been identified, particularly in combination with other energy infrastructure within the locality, and these have been taken into account in the assessment. These effects give rise to additional landscape harm, which is recognised and afforded appropriate weight in the planning balance. No significant cumulative effects are identified in respect of other environmental topics.

Climate Change

5.206 The submitted Environmental Statement includes a detailed assessment of greenhouse gas (GHG) emissions associated with the construction, operation and decommissioning of the development, adopting a whole-life carbon approach in accordance with recognised guidance.

5.207 The assessment identifies that emissions arising during the construction phase, including embodied carbon and construction traffic, are relatively limited in the context of local and carbon budgets and are assessed as minor adverse.

5.208 During the operational phase, emissions arise primarily from operational energy losses associated with battery charging and discharging, together with maintenance and component replacement. These emissions are assessed as moderate adverse at a local level and significant.

5.209 Similarly, emissions associated with the decommissioning phase are identified as moderate adverse at a local level.

5.210 Notwithstanding these effects, the assessment notes that the magnitude of emissions remains small relative to wider national carbon budgets and is considered within the context of the overall function of the development.

Carbon savings

5.211 The primary purpose of the development is to support the operation and efficiency of the electricity network by enabling the integration of renewable energy. The Environmental

Statement confirms that, over its operational lifetime, the development would facilitate a substantial reduction in greenhouse gas emissions by reducing reliance on fossil fuel generation and enabling greater uptake of renewable energy technologies.

5.212 The assessment estimates that the development would result in a net carbon saving in the order of approximately 8.8 to 13.0 million tonnes of carbon dioxide equivalent over a 40 to 60 year period. This represents a significant beneficial effect in the context of both local and national carbon reduction targets.

Conclusion on climate change

5.213 The proposed development would give rise to some adverse greenhouse gas emissions during construction, operation and decommissioning. These are assessed as moderate adverse at a local level in part; however, they are limited in scale when considered in the context of wider carbon budgets.

5.214 In contrast, the development would deliver long-term benefits through supporting the decarbonisation of the electricity network and enabling increased use of renewable energy, resulting in significant net carbon savings over its operational lifetime.

5.215 Having regard to both the adverse and beneficial effects, the Environmental Statement concludes that the overall residual effect of the development is beneficial in climate change terms.

5.216 In accordance with national policy, which requires that significant weight be afforded to the benefits of renewable and low carbon energy development, the proposal is considered to make a positive contribution to climate change mitigation and is afforded positive weight in the planning balance.

6.0 Weighing and balancing of issues / Overall Assessment

6.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

a. Provision of the development plan insofar as they are material,

b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,

c. Any other material considerations

6.2 The proposed development comprises a Greener Grid Park incorporating battery energy storage, synchronous compensator equipment, substation infrastructure and associated works. The development would provide energy storage and grid stabilisation services, helping to support the integration of renewable energy into the electricity network and

improve the stability and resilience of the grid. National policy provides strong support for renewable and low carbon energy infrastructure. Paragraph 168 of the NPPF confirms that applicants are not required to demonstrate the overall need for renewable or low carbon energy development, and that significant weight should be given to the benefits associated with such development and its contribution to a net zero future. EN-1 similarly identifies an urgent and ongoing national need for energy infrastructure and confirms that the benefits associated with low carbon energy infrastructure are likely to outweigh residual impacts in all but exceptional circumstances.

6.3 The proposal would also deliver biodiversity benefits. The development would deliver biodiversity net gain in excess of the statutory minimum, including approximately 58% habitat uplift and over 10% hedgerow gain. These ecological benefits attract moderate positive weight.

6.4 The development would generate economic benefits, principally during the construction phase through temporary employment opportunities and expenditure associated with site preparation, installation and infrastructure works. Operational employment would be limited given the largely unmanned nature of the development, but wider economic benefits would arise through the scheme's contribution to a secure and resilient electricity network, which supports broader economic activity. Moderate positive weight is afforded to these economic benefits.

6.5 The temporary and reversible nature of the development is also a relevant consideration. Permission is sought for a period of 40 years, after which the development would be decommissioned and the site restored. The submitted information confirms that above-ground infrastructure, including battery storage units, inverters, transformers, buildings, hardstanding and ancillary equipment, would be removed as part of the decommissioning process. This does not remove the harm arising during the operational period, but it limits the permanence of the land use change, the temporary nature of the development attracts neutral weight..

6.6 There are a number of technical matters which have been assessed and are not considered to give rise to unacceptable impacts, subject to the imposition of appropriate conditions. The Highway Authority has confirmed that the surrounding highway network is capable of accommodating the forecast construction traffic, with impacts controlled through a Construction Traffic Management Plan. The site lies within Flood Zone 1 and, although surface water flood risk has been identified as a constraint, the Lead Local Flood Authority raises no objection subject to conditions securing detailed drainage design, water quality treatment and exceedance routing. Noise impacts can be mitigated through acoustic barriers, bunding and plant selection, and Environmental Health is satisfied that impacts can be reduced to acceptable levels subject to conditions. Fire risk has been assessed through a Fire Safety Strategy, plume dispersion modelling and an independent review commissioned by the Local Planning Authority, with Buckinghamshire Fire and Rescue Service raising no objection in principle subject to further emergency planning and mitigation controls. These matters are therefore afforded neutral weight in the planning

balance.

6.7 The development would not result in the loss of Best and Most Versatile agricultural land, as the submitted Agricultural Land Classification assessment identifies the site as predominantly Grade 3b. The site is within a Minerals Safeguarding Area, but the proposal is temporary, predominantly surface-based and would not prevent future extraction following restoration. It is therefore not considered to result in unnecessary sterilisation of mineral resources. These matters do not weigh against the proposal.

6.8 The submitted evidence confirms the presence of archaeological remains associated with Romano-British activity and historic use of the wider landscape. Ground disturbance from the development could affect below-ground remains, but the Archaeological Officer does not object subject to a condition requiring a programme of archaeological works secured through a Written Scheme of Investigation. On this basis, archaeological impacts can be appropriately mitigated and are afforded neutral weight.

6.9 Against these benefits, the proposal would give rise to harm, principally in relation to landscape character and visual amenity. The site lies within Landscape Character Area 5.6, Claydon Valley, which is described as a shallow, predominantly agricultural valley with a strong field pattern, limited settlement and a sense of openness and rural tranquillity. The development would introduce large-scale engineered infrastructure into this open agricultural landscape, resulting in a material change to the character of the site and its immediate surroundings. Whilst mitigation through bunding and planting is proposed, this would not fully overcome the scale of change, particularly in the early years of operation.

6.10 There would also be visual harm experienced by nearby residential receptors, users of public rights of way and local routes. The most affected receptors include the Monkomb Farm complex, Station House, Tuckey Farm and users of nearby public rights of way including Bridleway BM ECL/2/1, Footpath BM ECL/4/1, Bridleway BM ECL/5/1 and Footpath BM WIS/1/1. In addition, the proposal would contribute to cumulative landscape and visual change when considered alongside other energy infrastructure in the area, including Tuckey Solar Farm and Rosefield Solar Farm. The cumulative effect would reinforce the perception of parts of the Claydon Valley as an energy landscape rather than a predominantly agricultural one. This conflict with Policy NE4 is significant and attracts significant negative weight.

6.11 There is also conflict with Policy BE2 in relation to design. The proposal comprises utilitarian energy infrastructure which does not fully respond to the rural character, local distinctiveness or visual qualities of the site and its surroundings. This harm is inherent in the nature of the development and, although moderated by landscaping and planting, attracts moderate negative weight.

Heritage Balance

6.12 As noted above, the proposal would result in less than substantial harm, at the lower end of the spectrum, to the significance of nearby designated heritage assets, arising from the introduction of energy infrastructure into their wider rural setting. This harm is primarily

experienced through a change in the character of the surrounding landscape, which contributes to the significance of assets such as Tuckey Farmhouse through their historic agricultural context.

6.13 In accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraph 208 of the NPPF, great weight is given to the conservation of heritage assets. The identified harm therefore weighs against the proposal and carries considerable importance in the planning balance.

6.14 Set against this harm are the public benefits of the proposal. The development would deliver nationally important energy infrastructure, supporting energy security, grid stability and the transition to a low carbon economy. These benefits are substantial and are afforded significant weight in accordance with national policy.

6.15 Additional benefits arise from the delivery of biodiversity net gain in excess of statutory requirements, alongside ecological enhancements and the temporary and reversible nature of the development. These factors further contribute positively to the overall balance.

6.16 Having regard to the limited extent of the heritage harm, moderated by distance, intervening features and the presence of existing infrastructure within the landscape, it is considered that in this case, the public benefits of the proposal outweigh the identified less than substantial harm identified.

Overall Balance

6.17 In attributing weight to cumulative landscape and visual effects, regard has been had to the nature and status of the schemes identified, including whether they are existing, consented, subject to DCO examination or at a more preliminary stage in the planning process. The cumulative weight applied reflects a realistic assessment of the likelihood of those schemes coming forward, such that greater weight is afforded to implemented and consented development, with more limited weight given to emerging or unconsented proposals.

6.18 The temporary and reversible nature of the proposed development and some of the identified schemes has also been taken into account.

6.19 It is recognised that there is an inherent tension in this case between the locational requirements of the development and its environmental effects. The proximity of the site to the East Claydon substation is a key driver of the proposal and reflects the need for such infrastructure to be located close to points of grid connection within the electricity transmission network. However, it is this same factor which has contributed to the clustering of energy infrastructure within the local area and, in turn, to the cumulative landscape and visual effects identified.

6.20 This tension has been carefully considered. Whilst the cumulative presence of energy infrastructure gives rise to harm, particularly in landscape terms, the locational need for development in proximity to grid infrastructure is a material consideration. The planning

balance therefore requires a judgement as to whether the benefits arising from this location outweigh the additional harm associated with cumulative effects.

6.21 Drawing these matters together, the proposal results in some conflict with the development plan, principally in relation to landscape character, alongside more limited conflict in respect of design. These harms are material and have been given appropriate weight.

6.22 However, the scheme delivers significant and nationally important benefits. The provision of grid support infrastructure to enable the integration of renewable energy, improve network resilience and contribute to decarbonisation attracts significant weight. These benefits are reinforced by biodiversity enhancements and the temporary and reversible nature of the development.

6.23 Having regard to the development plan as a whole and all other material considerations, it is considered that the adverse impacts identified, while significant in landscape terms, do not significantly and demonstrably outweigh the benefits of the proposal when assessed in the round. The strong policy support for energy infrastructure, together with the scale and importance of the benefits delivered, clearly outweigh the identified harm, including the great weight afforded to heritage considerations.

6.24 Accordingly, the proposal is considered to accord with the development plan when read as a whole, and therefore the proposal is recommended for approval.

6.25 Even if it were concluded that the identified policy conflicts mean the scheme does not fully comply with the Development Plan as a whole, there are substantial material considerations that strongly weigh in favour of the grant of planning permission and justify a departure from the plan. These considerations include the significant benefits of decarbonising the grid, which helps address the climate emergency, reduces curtailment, and provide energy security. These are significant factors that indicate the application should be approved and planning permission granted subject to the applying the recommending planning conditions.

Equalities Act

6.26 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

Human Rights

6.27 There may be implications under Article 8 and Article 1 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions. However, these potential issues are in this case amply covered by consideration of the environmental impact of the application under the policies of the

development plan and other relevant policy guidance.

7.0 Working with the applicant / agent

7.1 In accordance with paragraph 39 of the NPPF (2024) the Council approaches decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.

7.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.

7.3 The applicant was provided the opportunity to submit amendments to the scheme/address issues. The application is to be considered by the Planning Committee where the applicant/agent has the opportunity to speak to the committee and promote the application.

8.0 Recommendation

8.1 The recommendation is that the application be delegated to the Director of Planning Growth & Sustainability for APPROVAL subject to the conditions as proposed and any other considered appropriate by Officers below:

1. Time Limit

The development to which this permission relates must be begun not later than the expiration of five years beginning with the date on which this permission is granted.

Reason: The time limit condition is imposed in order to comply with the requirements of Section 91 of the Town and Country Planning Act 1990.

2. Temporary Period

The development hereby permitted shall be for a temporary period only to expire 40 years after the date of first commercial export of electricity to the grid ("the date of first export"). Written confirmation of the date of first export shall be provided to the Local Planning Authority within one month of the event.

Reason: To define the permission and in the interests of proper planning.

3. Approved Drawings

The development hereby permitted shall be carried out in accordance with the following approved plans/details:

STA008-SP-01 rev 08 Site Location Plan

STA008-PL-00 rev 07	Existing Site Layout Plan
STA008-EL-08 rev 02	Contextual Elevations/Sections
STA008-EL-07 rev 01	Contextual Elevations/Sections Key Plan
STA008-EL-06 rev 06	Access Road Under Overhead Lines Elevation/Sections
STA008-PL-03B rev 09	Proposed Layout Plan
STA00B-PL-04B rev 06	Proposed Layout Plan
STA008-SD-01 rev 03	Battery Block Plan Details
STA008-SD-03 rev 03	Control Container Details
STA008-SD-04 rev 02	Switchgear Room Details
STA008-SD-05 rev 02	Control & Metering Room Details
STA008-SD-06 rev 02	Stores Details
STA008-SD-07 rev 03	Comms & LV Room Details
STA008-SD-08 rev 02	Gate (Security & Personnel) Details
STA008-SD-09 rev 02	Noise Attenuation Fence Details
STA008-SD-10 rev 02	Palisade Fence Details
STA008-SD-11 rev 02	Livestock Fence Details
STA008-SD-12 rev 02	Light Column & CCTV
STA008-SD-14 rev 03	Diesel Generator (Genset) Details
STA008-SD-15 rev 05	HV Yard Details
STA008-SD-15.1 rev 05	HV Yard Details
STA008-SD-16 rev 04	Secondary Substation Details
STA008-SD-16.1 rev 02	Secondary Substation Details
STA008-SD-17 rev 02	Welfare & Office Details
STA008-SD-18 rev 02	Underground Water Tank Details
STA008-SD-19 rev 02	Operations Compound Details
STA008-SD-20 rev 05	Access Tracks Sections
STA008-SD-21 rev 02	Energy Management Building Details
STA008-SD-22 rev 01	Circuit Breaker Details
STA008-SD-23 rev 01	Cooler Unit Details
STA008-SD-24 rev 02	Air-Cored Reactor Details
STA008-SD-25 rev 01	Transformer Details

029773-WSP-ZZ-ZZ-SK-TP-003 rev P01 Construction Access General Arrangement
UG_2507_LAN_GA_DRW_102 rev P08 Landscape General Arrangement
UG_2507_LAN_HL_DRW_103 rev P05 Hard Landscape Plan
UG_2507_LAN_SL_DRW_104 rev P07 Soft Landscape Plan 1 of 3
UG_2507_LAN_SL_DRW_105 rev P07 Soft Landscape Plan 2 of 3
UG_2507_LAN_SL_DRW_106 rev P06 Soft Landscape Plan 3 of 3
2291-KC-XX-YTREE-TCP01 rev 0 Tree Constraints Plan
2291-KC-XX-YTREE-TPP01 rev B Tree Protection Plan
2291-KC-XX-YTREE-SP01 rev 0 Tree Section Plan

Statutory Biodiversity Metric V2 (dated 05/09/2025)

Reason: For the avoidance of doubt and in the interests of proper planning.

4. Final Details and Plans

No installation of battery block units or inverter skids within the four battery quadrant areas identified on plans refs. STAO8-PL-03B Rev 09 and STAO8-PL-04B Rev 06 shall take place until details of the final layout, design, scale, elevations, external appearance, finishes and materials of those battery block units and inverter skids have been submitted to and approved in writing by the Local Planning Authority.

The submitted details shall be in accordance with the approved parameter plans and shall not exceed the maximum quantum, height, row length, width, spatial parameters and development areas assessed in the Environmental Statement and shown on the approved plans STAO8-SD-01 Rev 03, STAO8-PL-03B Rev 09 and STAO8-PL-04B Rev 06.

Prior to the installation of any other above-ground buildings, plant or equipment, details of their external appearance, finishes and materials shall be submitted to and approved in writing by the Local Planning Authority. All external materials and finishes shall be recessive and non-reflective unless otherwise agreed in writing by the Local Planning Authority.

The development shall thereafter be carried out in accordance with the approved details and retained as such for the lifetime of the development.

Reason: To ensure that the final detailed design of the battery storage and inverter skid elements remain within the parameters assessed in the Environmental Statement and approved by the Local Planning Authority, while securing appropriate external appearance, finishes and materials for all other above-ground buildings, plant or equipment. The condition is required to ensure the development is carried out in a manner which minimises its impact on the character of the rural area and safeguards visual amenity, in accordance with Policies BE2, NE4, NE1, NE2, NE8 and BE3

of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

5. Construction Hours

Construction activities shall be limited to take place between the hours of 8am – 6pm Monday to Friday and 8am - 1pm (Saturday). No construction works shall take place on Sundays, bank holidays or other national holidays.

Reason: To protect residential amenity during the construction phase of the development, in accordance with policy BE3 of the Vale of Aylesbury Local Plan (2021).

6. Decommissioning and Site Restoration At the end of the approved operational period, or in the event that the development ceases to operate for a continuous period of 6 months within a 12 month period, the use hereby permitted shall cease and a detailed decommissioning and site restoration scheme shall be submitted to and approved in writing by the Local Planning Authority within 6 months of that cessation.

The decommissioning and restoration scheme shall include, but not be limited to, the following:
a) a programme and timetable for the decommissioning works;
b) a method statement for the dismantling and removal of all plant, equipment and infrastructure associated with the development, including battery storage units, synchronous compensator buildings, transformers, substation equipment (excluding any permanent infrastructure expressly approved), cabling, hardstanding, buildings, fencing and security equipment;
c) details of the depth and extent of removal of foundations, underground structures and surfacing;
d) a Decommissioning Traffic Management Plan to address traffic movements associated with the removal works;
e) a method statement for the restoration of soils and return of the land to agricultural use or other agreed use;
f) details of any infrastructure proposed to be retained on site;
g) a timetable for restoration and aftercare of the land; and
h) details of the removal, recycling or disposal of all materials arising from the development.
The approved scheme shall be implemented in full in accordance with the approved details and timetable.

For the avoidance of doubt, retained planting, ecological enhancements and habitat features shall not be removed unless otherwise agreed in writing by the Local Planning Authority as part of the approved restoration scheme.

Reason: To ensure the appropriate and timely restoration of the site following cessation of the development, in the interests of landscape character, biodiversity, and the long-term protection of the rural environment, in accordance with Policies NE4, NE1, NE8, BE2 and C3 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

7. Archaeological Written Scheme of Investigation

No development shall take place until the applicant, or their agents or successors in title, have undertaken a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the planning authority. The development shall only be implemented in accordance with the approved written scheme of investigation.

Reason: The reason for this pre-start condition is to record archaeological evidence that may be present at the site prior to construction to comply Policy BE1 of Vale of Aylesbury Local Plan (2021) and the advice within the NPPF.

8. Pre-commencement Highways Survey

Prior to the commencement of development, a pre-commencement highway condition survey of all sections of the public highway likely to be used by construction traffic within an agreed specified distance of the site shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority.

A post-construction highway survey will be required, following the completion of the construction of the development hereby permitted, and the applicant will be required to rectify and repair and damage identified as a result of construction traffic.

Reason: This is a pre-commencement condition as the use of the local highway network by construction traffic has the potential to cause damage and adversely affect highway safety. The condition is required to ensure that the condition of the highway is appropriately recorded and that any damage arising from the development is properly rectified, in the interests of highway safety and the free flow of traffic, in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

9. Construction Traffic Management Plan

Notwithstanding the details submitted, no development shall commence until an updated Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority.

The CTMP shall include, but not be limited to, the following:
i. the hours of operation for construction activities;
ii. details of construction vehicle movements, including anticipated numbers, types, sizes and frequency;
iii. a programme of construction works and associated delivery schedules;
iv. timing of deliveries and construction traffic to avoid peak hours where reasonably practicable;

v. a framework for the management of abnormal indivisible loads;
vi. details of all construction access points to the site;
vii. the location and layout of construction compounds, storage areas, parking, manoeuvring areas and temporary surfacing;
viii. details of wheel washing and vehicle cleaning facilities, including their design, location and the disposal of wash water and any contaminants;

x. a routing plan for all construction traffic, including measures to ensure compliance by contractors and suppliers;
xi. details of directional signage and route marking for construction traffic;
xii. general site signage;
xiii. temporary traffic management measures, including traffic control arrangements where necessary;
xiv. provision of banksmen to manage vehicle movements and ensure the safety of other road users;
xv. measures to safeguard non-motorised users of the highway and any adjacent routes, including pedestrians, cyclists and equestrians;
xvi. details of a point of contact for the Local Planning Authority, Highway Authority and local stakeholders;
xvii. measures to control noise, dust and disturbance arising from construction traffic; and
xviii. a Construction Staff Travel Plan aimed at minimising staff vehicle movements to and from the site.

The development shall thereafter be carried out in full accordance with the approved CTMP.

Reason: This is a pre-commencement condition as the nature and scale of construction traffic has the potential to give rise to impacts on highway safety, residential amenity and the efficient operation of the highway network. The condition is required to ensure that such impacts are appropriately managed, in accordance with Policies T4, T5 and BE3 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

10. Construction environmental management plan (biodiversity)

No development shall commence (including demolition, ground works or vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority.
The CEMP shall include, but not be limited to, the following:
a) a risk assessment of construction activities with the potential to adversely affect ecological features;
b) identification and mapping of biodiversity protection zones, including watercourses, retained trees, hedgerows and habitats;
c) details of measures (including method statements and working practices) to avoid or reduce impacts on protected and priority species and habitats, including but not limited to reptiles, bats,

breeding birds, badgers and other relevant species present on site;
d) the timing and sequencing of works to avoid sensitive periods for ecological receptors;
e) details of ecological supervision, including the role, responsibilities and timing of attendance of an Ecological Clerk of Works (ECoW) or suitably qualified specialist;
f) details of any required pre-commencement and update surveys for relevant species;
g) a sensitive lighting strategy for the construction phase, where lighting is required, including a lux plan and measures to minimise light spill onto retained habitats;
h) details of protective fencing, exclusion zones, buffer areas and warning signage; and
i) details of responsible persons, site management procedures and lines of communication to ensure compliance with the CEMP.

The development shall thereafter be carried out in full accordance with the approved CEMP for the duration of the construction period.

Reason: This is a pre-commencement condition as construction activities have the potential to adversely affect ecological features and protected species. The condition is necessary to ensure that the development is undertaken in a manner which avoids or minimises impacts on biodiversity, in accordance with Policy NE1 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

11. Surface Water Drainage Scheme

No development shall commence until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the principles set out in the approved Flood Risk Assessment and Drainage Strategy and shall be implemented in full in accordance with the approved details prior to the development being brought into first use.
The scheme shall include, but not be limited to, the following:
a) an assessment of sustainable drainage system (SuDS) components in accordance with the CIRIA SuDS Manual (C753), including justification for the exclusion of any SuDS techniques;
b) demonstration that water quality, ecological and amenity benefits have been incorporated into the design, with priority given to above-ground SuDS where feasible;
c) a water quality assessment demonstrating that the total pollution mitigation index meets or exceeds the pollution hazard index;
d) details of existing greenfield runoff rates and proposed discharge rates and volumes;
e) full construction details of all drainage and SuDS components;
f) a detailed drainage layout, including pipe sizes, gradients, network configuration and storage volumes;
g) calculations to demonstrate that the drainage system can accommodate the 1 in 30 year storm event without flooding, and that any flooding between the 1 in 30 and 1 in 100 year plus climate change event is contained safely within the site;
h) details of exceedance flow routes and demonstrate that such flows will be managed within the

site and will not increase flood risk elsewhere; and
i) details of ongoing management and maintenance of the drainage system for the lifetime of the development.

Reason: This is a pre-commencement condition as the design of the drainage system has implications for flood risk, water quality and site layout. The condition is required to ensure that surface water is managed in a sustainable manner without increasing flood risk on or off site, in accordance with Policy I4 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

12. Noise Limits

No development shall commence (including the installation of any plant or equipment) until a detailed scheme for the control of operational noise emissions from the development has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be informed by the approved Noise Impact Assessment and shall include, but not be limited to, the following:

a) details of all fixed plant and equipment, including sound power levels;
b) details of noise attenuation measures, including acoustic barriers and bunding, with specific reference to the provision, design, location and construction of the proposed acoustic fence and earth bund identified within the approved plans;
c) predicted noise levels at the nearest noise-sensitive receptors, demonstrating compliance with agreed noise limits, including appropriate consideration of night-time impacts; and
d) a programme for the implementation, verification and ongoing maintenance of all noise mitigation measures.

The approved scheme shall be fully implemented prior to the first operation of the development and shall thereafter be retained and maintained for the lifetime of the development.

Reason: This is a pre-commencement condition as the detailed specification and location of plant and mitigation measures has the potential to materially affect noise impacts on nearby receptors. The condition is required to ensure that operational noise is controlled to an acceptable level, in order to protect residential amenity, in accordance with Policy BE3 and Policy NE5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

13. Lighting strategy

No external lighting shall be installed on the site until a detailed external lighting scheme has been submitted to and approved in writing by the Local Planning Authority.

The lighting scheme shall include, but not be limited to, the following:
a) the location, height, design and specification of all lighting columns and luminaires;
b) lighting levels (in lux) and a lux contour plan demonstrating the extent of light spread across the site and surrounding areas;
c) details of the directionality, shielding and control of lighting to minimise light spill beyond the site boundary;
d) details of lighting operation, including hours of use and control mechanisms (such as timers or motion sensors), demonstrating that lighting is used only when required; and
e) measures to ensure that the site functions as a dark corridor for wildlife, particularly in relation to retained hedgerows, tree belts and ecological buffers.
The approved lighting scheme shall be installed prior to the first operation of the development and thereafter maintained in accordance with the approved details for the lifetime of the development.

Reason: To ensure that external lighting does not adversely affect the character of the rural area, visual amenity, residential amenity or ecological interests, in accordance with Policies BE2, BE3, NE1 and NE4 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

14. Battery Safety and Management Plan

Prior to the installation of battery units or associated plant and equipment) until a Battery Safety and Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Battery Safety and Management Plan shall include, but not be limited to, the following:
a) details of the battery technology to be installed, including safety systems and compliance with relevant industry standards;
b) measures for the prevention, detection and control of thermal runaway events, including monitoring systems and automatic shutdown procedures;
c) details of fire detection and suppression systems within battery units and across the site;
d) layout and spacing principles between battery units and other infrastructure to prevent fire propagation;
e) procedures for the management, storage and handling of batteries throughout their operational life;
f) maintenance, inspection and monitoring procedures;
g) procedures for dealing with damaged, defective or end-of-life batteries, including removal, storage and disposal;
h) integration with the site-wide Emergency Response Plan, including liaison with emergency services; and
i) arrangements for reviewing and updating the plan over the lifetime of the development.
The approved Battery Safety and Management Plan shall be implemented in full prior to the first operation of the development and shall be adhered to and maintained for the lifetime of the

development.

Reason: This is a pre-commencement condition as the design, installation and operation of battery storage infrastructure has the potential to give rise to safety risks. The condition is required to ensure that appropriate measures are in place to minimise the risk of fire and to manage battery safety throughout the operational life of the development, in the interests of protecting public safety and the environment, in accordance with Policy NE5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

15. Fire and Emergency Response Plan

No part of the development shall be brought into operational use until a site-specific Fire and Emergency Response Plan has been submitted to and approved in writing by the Local Planning Authority, in consultation with Buckinghamshire Fire and Rescue Service.

The Fire and Emergency Response Plan shall include, but not be limited to, the following:
a) procedures for responding to fire incidents, including system shutdown, isolation and containment measures;
b) details of emergency access arrangements and internal circulation routes for fire and rescue vehicles;
c) provision of firewater supplies, including storage, hydrants and distribution across the site;
d) measures for the control and containment of firewater run-off and prevention of pollution;
e) identification and management of risks associated with hazardous materials, including toxic, flammable or explosive gases;
f) protocols for liaison and communication with emergency services;
g) procedures for the evacuation of personnel and securing the site; and
h) arrangements for review and updating of the plan throughout the lifetime of the development.
The approved Fire and Emergency Response Plan shall be implemented in full prior to operation and shall thereafter be maintained and adhered to for the lifetime of the development.

Reason: To ensure that appropriate emergency procedures and mitigation measures are in place to minimise risks to public safety, the environment and surrounding land uses, in accordance with Policy NE5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

16. Landscaping scheme

No development shall commence until a hard and soft landscape scheme together with a schedule of landscape maintenance has been submitted to and approved in writing by the Local Planning Authority. The hard and soft landscaping scheme and schedule of landscape maintenance must include:

- details of all trees and other planting to be retained;

- a planting specification and plan to include numbers, size, species, positions of all new trees and shrubs; details of existing and proposed levels, walls, fences and other boundary treatments (including colour);
- details of proposed surface treatments;
- a programme of implementation; a schedule of landscape maintenance covering a minimum period of five years following substantial completion of the development for all landscaping works; and
- a schedule of landscape maintenance for soft landscaping adjacent to BESS compounds for the lifetime of the development to ensure vegetation does not grow within 10m of any BESS container.

All hard and soft landscape works shall be carried out in accordance with the approved details and the landscaping shall be maintained in accordance with the approved schedules of landscape maintenance.

Reason: This pre-start condition is necessary to ensure the adequate mitigation of the landscape and visual impact of the proposals and the provision of an appropriate hard and soft landscape scheme prior to the development reaching an advance stage; to ensure that the agreed hard and soft landscape scheme is implemented; and to ensure that soft landscaping complies with National Fire Chiefs Council guidance 'Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services' (2023), in accordance with Policy NE4 of the Vale of Aylesbury Local Plan.

17. Landscape implementation and replacement

All planting, seeding and turfing included in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the development hereby permitted. Any retained trees, hedgerows or shrubs forming part of the approved landscaping scheme which within a period of 10 years from the occupation of the development, die, are removed or become seriously damaged or diseased shall be replaced during the next planting season and shall be in accordance with the previously approved details.

Reason: To ensure a satisfactory and continuing standard of amenities are provided and maintained in connection with the development.

18. Landscape and ecological management plan (LEMP)

No development shall commence (including site clearance and ground works) until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority.

The LEMP shall include, but not be limited to, the following:

a) a description and evaluation of the ecological and landscape features to be managed;
b) identification of ecological constraints and site-specific factors influencing management;
c) clearly stated aims and objectives for the site, including the delivery and maintenance of

biodiversity net gain in accordance with the approved biodiversity assessment;
d) details of habitat creation and enhancement measures, including planting, grassland management, and strengthening of boundary features;
e) details of species-specific enhancement measures appropriate to the site;
f) details of any lighting to be installed, including a wildlife-sensitive lighting strategy to minimise impacts on retained and created habitats;
g) prescriptions for the ongoing management and maintenance of habitats and landscape features;
h) a programme of works and long-term management schedule, including a rolling plan covering a minimum period of 30 years;
i) details of the organisation(s) responsible for implementing and monitoring the plan; and
j) a monitoring framework, including reporting, review mechanisms, and provision for remedial measures where objectives are not being achieved.
The LEMP shall also include details of the legal and funding mechanisms to secure its long-term delivery. The approved plan shall be implemented in full for the lifetime of the development in accordance with the approved details.

Reason: This is a pre-commencement condition as the development has the potential to affect biodiversity and landscape features and requires coordinated mitigation and enhancement from the outset. The condition is necessary to ensure the protection, management and long-term enhancement of biodiversity, including delivery of biodiversity net gain, in accordance with Policies NE1, NE2 and NE8 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

19. Tree protection and arboricultural method statement

No development shall commence (including demolition and site clearance) until an updated Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP), prepared in accordance with BS5837:2012 (Trees in relation to design, demolition and construction – Recommendations), have been submitted to and approved in writing by the Local Planning Authority.

The approved tree protection measures, including the erection of protective fencing and installation of ground protection, shall be installed prior to the commencement of any works on site and shall be retained for the duration of the construction period. No works, materials storage, or ground disturbance shall take place within any protected areas or Root Protection Areas (RPAs) without the prior written approval of the Local Planning Authority.

The AMS and TPP shall include, but not be limited to, the following:

a) detailed plans and specifications for all phases of construction, including the location and specification of protective fencing, ground protection measures and any temporary or permanent works within RPAs;
b) details of the location and installation methods of all proposed and existing services, utilities and drainage infrastructure, including SuDS features, where these are located within or adjacent to RPAs;
c) details of any “no-dig” construction methods, including cellular confinement systems, demonstrating compliance with BS5837 and current arboricultural best practice;

d) details of all proposed access facilitation works, including pruning of branches and roots, to be undertaken in accordance with BS3998:2010 (Tree Work – Recommendations);
e) a programme of works identifying the sequence and timing of operations in relation to tree protection, including details of supervision by a suitably qualified arboricultural consultant;
f) details of site supervision procedures, including monitoring, reporting arrangements and mechanisms for ensuring compliance with the approved AMS; and
g) the location of site compounds, contractor parking, material storage areas, plant, machinery, and any other construction-related infrastructure.

The development shall thereafter be carried out in full accordance with the approved AMS and TPP.

Reason: This is a pre-commencement condition as works on site have the potential to adversely affect retained trees and hedgerows. The condition is required to ensure that the crowns, stems and root systems of retained trees are protected during construction, in the interests of visual amenity, landscape character and biodiversity, in accordance with Policy NE8 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

20. Great Crested Newts

No development shall commence (including ground works and vegetation clearance) until a Non-Licensed Method Statement for great crested newts has been submitted to and approved in writing by the Local Planning Authority.

The Method Statement shall include, but not be limited to, the following:

a) a summary of the ecological baseline, including survey results, identification of risks to great crested newts, reference to relevant legislation, and justification for why a Natural England licence is not required;
b) details of reasonable avoidance measures to minimise impacts on great crested newts, including timing of works, pre-commencement checks, site clearance methodology, and sensitive working practices;
c) details of any supervision requirements by a suitably qualified ecologist and provision of toolbox talks for site operatives; and
d) procedures to be followed in the event that great crested newts are encountered during works, including cessation of works and notification protocols.

The development shall thereafter be carried out in full accordance with the approved Method Statement.

Reason: This is a pre-commencement condition as ground works have the potential to impact protected species. The condition is required to ensure that the development is undertaken in a manner that avoids harm to great crested newts and minimises the risk of offences under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), in accordance with Policy NE1 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

21. Biodiversity mitigation, compensation and enhancement

No development shall commence (including vegetation clearance and ground works) until a detailed Biodiversity Enhancement Strategy has been submitted to and approved in writing by the Local Planning Authority.

The strategy shall set out the measures required to avoid, mitigate and compensate for ecological impacts arising from the development, together with proposals for habitat creation and enhancement to deliver biodiversity net gain in accordance with the approved ecological assessment.

The strategy shall include a programme for implementation, together with a timetable for delivery of all measures. Evidence of implementation, including photographic records where appropriate, shall be submitted to the Local Planning Authority in accordance with an agreed schedule.

The development shall thereafter be carried out in full accordance with the approved strategy and all mitigation, compensation and enhancement measures shall be retained and maintained for the lifetime of the development.

Reason: This is a pre-commencement condition as works have the potential to impact biodiversity and require coordinated mitigation from the outset. The condition is necessary to ensure the protection, mitigation and enhancement of biodiversity, including the delivery of biodiversity net gain, in accordance with Policy NE1 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

22. Construction access

No development shall commence (excluding site clearance and preparatory works) until the construction access off East Claydon Road has been formed, laid out and constructed in accordance with the approved details and Buckinghamshire Council highway standards.
The access shall thereafter be retained in accordance with the approved details for the duration of the construction period.

Reason: To ensure safe access to the site during the construction phase and to minimise danger, obstruction and inconvenience to users of the highway, in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

23. Construction access visibility splays

No development shall commence until the visibility splays associated with the construction access off East Claydon Road have been provided in accordance with the approved plans.
The areas within the visibility splays shall thereafter be kept free from any obstruction exceeding 0.6 metres in height above the adjoining carriageway level for the duration of the construction

period.

Reason: To ensure adequate visibility in the interests of highway safety, in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

24. Removal of construction access

Within one month of the operational access being brought into use, the temporary construction access shall be permanently closed and the land reinstated in accordance with details to be agreed in writing by the Local Planning Authority.

Reason: To minimise the number of access points and ensure the safe and efficient use of the highway, in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

25. Operational access

No part of the development shall be brought into operational use until the permanent operational access off East Claydon Road has been constructed in accordance with the approved plans and Buckinghamshire Council highway standards.

The operational access shall thereafter be retained and maintained for the lifetime of the development.

Reason: To ensure the provision of a safe and suitable access in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

26. Operational access visibility splays

No part of the development shall be brought into operational use until the visibility splays for the operational access have been provided in accordance with the approved plans.
The areas within the visibility splays shall thereafter be kept free from obstruction exceeding 0.6 metres in height above the adjoining carriageway level.

Reason: To ensure adequate visibility and safe operation of the highway network, in accordance with Policies T4 and T5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

27. Unexpected contamination

If during development, contamination not previously identified is found to be present at the site, all works in the affected area shall cease immediately and the Local Planning Authority shall be

notified in writing.

An investigation and risk assessment shall be undertaken in accordance with BS10175:2011+A2:2017 (Investigation of potentially contaminated sites – Code of practice). Where remediation is required, a remediation scheme, including a timetable for implementation, shall be submitted to and approved in writing by the Local Planning Authority.

The approved remediation scheme shall be implemented in full in accordance with the agreed details and timescales. Following completion of the works, a verification report demonstrating completion of the remediation shall be submitted to and approved in writing by the Local Planning Authority prior to the completion of development.

Reason: To ensure that risks from previously unidentified contamination are appropriately assessed and mitigated, in the interests of protecting human health, controlled waters and the wider environment, in accordance with Policy NE5 of the Vale of Aylesbury Local Plan and the National Planning Policy Framework.

28. Skylark Plots Mitigation

No development shall commence until a Skylark Mitigation Strategy has been submitted to and approved in writing by the Local Planning Authority.
The purpose of the strategy shall be to compensate for the loss or displacement of skylark nesting territories arising from the development. The strategy shall include provision for off-site skylark nesting habitat where on-site mitigation is not feasible, in accordance with relevant guidance.
The strategy shall include, but not be limited to, the following:

a) confirmation of the number of skylark territories affected by the development and the level of compensation required, including the provision of skylark plots on a minimum 2:1 ratio basis;
b) the location of the off-site land to be used for skylark mitigation, together with evidence that the land is available for the purposes of the mitigation strategy;
c) detailed design and layout of the skylark plots, including size, spacing and distribution;
d) a management and maintenance regime to ensure the land is retained as suitable habitat for skylark throughout the operational lifetime of the development, in accordance with current RSPB and/or Natural England guidance;
e) timescales for implementation, including provision prior to the commencement of development;
f) details of the body or organisation responsible for implementing, managing and monitoring the mitigation; and
g) arrangements for monitoring and review, including remedial measures should the mitigation not achieve the intended outcomes.

The approved Skylark Mitigation Strategy shall be implemented in full in accordance with the approved details and thereafter maintained for the lifetime of the development.

Where off-site mitigation is proposed outside the application boundary, the approved strategy shall be secured for the duration of the development through a legal agreement.

Reason: To ensure that the loss of ground nesting bird habitat, including skylark territories, is appropriately compensated for, in accordance with Policy NE1 of the Vale of Aylesbury Local Plan, the National Planning Policy Framework, and relevant ecological guidance, and to secure measurable biodiversity compensation over the lifetime of the development.

Informatives:

1. The applicant is advised that the highway access works will need to be constructed under a Section 184 of the Highways Act legal agreement. This agreement must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the highway. A minimum period of 8 weeks is required to process the agreement following the receipt by the Highway Authority of a written request. Please contact the Highways Development Management Delivery Team via: highwaysdm@buckinghamshire.gov.uk

2. The applicant is advised that temporary signs on the highway and works to repair / rectify highway damage will require a highway license. Please contact the Transport for Buckinghamshire Streetworks Team via: streetworkslicences@buckinghamshire.gov.uk

3. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under S137 of the Highways Act 1980.

4. It is an offence under S151 of the Highways Act 1980 for vehicles leaving the development site to carry mud onto the public highway. Facilities should therefore be provided and used on the development site for cleaning the wheels of vehicles before they leave the site.

5. Please note that condition 17 requires a site wide Hedgerow Management Plan should form part of the Landscape Management Plan. The aim of a site wide Hedgerow Management Plan is to manage hedgerows to a height of 3m, accepting that height of each hedgerow will vary during the management cycle as hedgerows cannot be held at any growth stage indefinitely. It should: Identify what condition each existing and new hedgerow is in using the Hedgelink Management Scale described in the Hedgerow Management Cycle guidance available from https://hedgelink.org.uk/; Indicate what traditional management regime will be carried out appropriate to that scale eg. Trimming, re-shaping. laying (traditional and/or mechanical). coppicing; identify management regimes to be undertaken on a rotational basis across the site, ensuring a variety of hedgerow states and heights to ensure maximum habitat diversity and visual screening.

Under the terms of the Land Drainage Act 1991 and the Flood and Water Management Act 2010, the prior consent of the relevant drainage authority is required for any works or structures within or affecting a watercourse.

Where the watercourse is designated under the remit of the Internal Drainage Board, consent will be required from the IDB. In all other cases, consent will be required from the Lead Local Flood Authority.

Following the grant of planning permission, the applicant must apply for Land Drainage Consent to the relevant authority. Further information and application forms are available on the respective authority's website. Applicants should note that this process can take up to two months.

APPENDIX A: Consultation Responses and Representations

Councillor Comments

This request was agreed at our Parish Council meetings held on Tuesday 17th June 2025, in recognition of the application's scale, complexity, and potential impact on the local community and environment. The Councils believe it is in the public interest for the application to be considered through the full committee process to ensure transparency, proper scrutiny, and the opportunity for community representation. Councillor Frank Mahon and myself Cllr Philip Gomm have been requested by East Clayton Parish Council and Granborough Parish Council to call-in application 25/01297/APP. The reason is as follows below. This request was agreed at the Parish Council meetings held on Tuesday 17th June 2025, in recognition of the application's scale, complexity, and potential impact on the local community and environment. The Councils believes it is in the public interest for the application to be considered through the full committee process to ensure transparency, proper scrutiny, and the opportunity for community representation. Cllr Mahon is the Grendon Underwood Ward Cllr Gomm is the Quainton Ward So, this is a joint 2 Member Call-In. If there is anything else you require, please don't hesitate to contact us, jointly.

Kindest regards Cllr Philip Gomm & Cllr Frank Mahon

Parish/Town Council Comments

East Claydon Parish Council

East Claydon Parish Council's Response is appended to the report at Appendix C.

Hogshaw Parish Council

Hogshaw Parish Council strongly objects to this proposal and agrees with all the comments in the submission made by East Claydon Parish Council.

Edgcott Parish Council

A planning application for a BESS at Rookery Farm Granborough was recently refused by the Bucks Council Planning Committee and is now subject to appeal. This current application in nearby East Claydon Road is larger and the same grounds for refusal appear to apply ie the development will be introduced into a strongly agricultural landscape and would be significantly incongruous. It will have significant adverse impact on visual amenity and on the landscape character at the site, local and landscape character area levels. Furthermore, the cumulative effects of the proposal with Tuckey Farm (consented permission) and the existing East Claydon sub-station would lead to cumulative visual and landscape character effects which would be significantly adverse. Together this would change the existing predominantly pastoral landscape to one defined by energy development. The proposal is contrary to Policy C3, BE2 and NE4 of the Vale of Aylesbury Local Plan (VALP) 2021 and paragraph 187 of the National Planning Policy

Framework (NPPF) 2024.

The Fire Safety Strategy for this current application does little to allay the fears of local residents regarding the hazards associated with lithium-ion batteries. It follows that the amount of plant and machinery on site raises serious concerns in respect of noise pollution, light pollution and air quality. The risks of vapour cloud, thermal runaway and explosion are also very real.

The cumulative effect of this BESS project together with the proposed Rosefield Solar Farm, the Tuckey Farm Solar Panel Site, and the Winslow Road sub station expansion will industrialise this part of Buckinghamshire.

The availability of agricultural land in this part of Bucks is already in serious decline. Buckinghamshire has already lost and is still losing significant areas of farmland due to other infrastructure projects. This cumulative impact must be taken into account and this proposal will add to the problem and would have a serious negative impact on the local communities.

Local roads have been struggling to cope in recent years with the massive amount of HGV traffic serving HS2 and EWR. This will be exacerbated not only by these energy projects but also the approved mega prison nearby. All of this construction activity will continue into the next decade and with local roads already in chaos then any further development will only worsen the situation. East Claydon Road and the local roads are totally unsuitable for construction traffic.

The proposed working hours for construction of 07:00 to 18:00 Monday to Friday and 07:00 to 14:00 on Saturdays for 2 years are also unacceptable to local residents together with the noise from the site after completion.

This greenfield site is just under 112 acres in area and the further loss of any agricultural land now is counter to the country's need to improve its food security. Recent updates to the NPPF confirms at Footnote 62 that "The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development".

The development of this greenfield site would result in a significant loss of open countryside and would result in adverse landscape and visual impacts on the site and would give rise to harmful effects on the character of this area. These visual factors together with policy references were confirmed in the refusal of the Rookery Farm application.

The Flood Risk Assessment provided by the applicant is lengthy, but concerns remain that concreting over much of this green field site will increase the risk of flooding and land contamination in and around site.

The proposal will do irretrievable damage to the rural area by increasing traffic particularly during construction, spoiling views, and harming the landscape, disrupting wildlife, and causing harm and

anxiety to the wellbeing of local people.

It follows that a refusal of this planning application is respectfully requested.

Calvert Green Parish Council

We as a Parish Council would like to submit our objections to the STRATKRAFT planning application.

1. Health and Safety - Fire Risk
The fire risk associated with BESS would be extremely damaging to local people. This has been highlighted by the Moss Landing Battery Plant disaster in Monterey in January this year, which produced toxic vapours and dangerous chemicals which were found in the soil. Elevated levels of manganese, copper and Aluminium 5 were found in drinking water, posing risks to human health and ecosystems.

However small the risk of an explosion, the risk is always there, and therefore, these BESS should not be sited close to neighbourhoods.

Lithium-ion fires are notoriously difficult to extinguish, so when the inevitable fire occurs, the current policy of all fire and rescue services is to let the fire burn out while protecting adjacent containers. This leads to the release of toxic emissions (such as hydrogen fluoride) and particulates over a number of hours/days to the surrounding area for miles around.

Large-scale lithium battery storage facilities do not currently come under the remit and control of the Health and Safety Executive, and the Fire and Rescue services are not a statutory consultee in the planning process. Any ongoing engagement is at the discretion of the energy company. Is the developer fully meeting the NFCC guidelines?

A standard minimum of 6 metres between BESS units is recommended under NFCC guidelines
The cumulative impact and disruption to our local area (in addition to the existing projects), EWR, HS2, with the felling of trees, destruction of habitats, and disturbance to local wildlife. These have already caused irreparable damage to our landscape and ecosystems, leading to the loss of biodiversity and the degradation of natural resources. Construction disruption in Calvert Green has been highly impacted by the ongoing construction of HS2/EWR and were given assurances at the initial stages around HGVs, roads, road closures and our green.

Granborough Parish Council

The proposed site lies within the Parish of East Claydon adjacent to the boundary with Granborough Parish. The Claydon Brook referred to in the "Description of the Site" forms part of the boundary between the two Parishes. The applicant refers to three settlements, East Claydon, Verney Junction and Winslow but makes no reference to the settlement of Granborough, the nearby hilltop settlement with views towards the proposed development site. As a result of this omission there appears to have been no consideration by the applicant of any potential impacts on Granborough, such as visual and noise.

Grounds of Objection
GPC primary objection relates to the potential cumulative impact of this development and the others in the immediate vicinity. Buckinghamshire Council have already stated in their pre application advice to Statkraft that "BESS facilities are often required to be close to National Grid substations to facilitate connections and enhance the grid's capability to manage energy flows efficiently, in this case using the future East Claydon substation. The advice notes that the cumulative effects of the development with other developments in the area would need to be assessed in the application."

These proposals are outlined below:
1. The Statera proposal for a 500MW BESS within the GPC area is in close proximity to the existing East Claydon Substation. This proposal was refused by the Buckinghamshire Council Strategic Planning Committee and is subject of an appeal to be heard in July 2025.

2. The Rosefield Solar Farm, a proposal covering some 1689 acres including 689 acres of solar panels plus a BESS and associated structures. This proposal is an NSIP application and not dealt with by the Buckinghamshire Council. The site extends from the Claydon Brook around the Claydon villages and on to the village of Calvert and destroys large areas of farmland and businesses. The current proposal is approaching the "submission and acceptance window for examination" scheduled for Summer/Autumn 2025.

3. The proposal by the National Grid to replace the existing electricity substation which is approaching the end of its operational life and has no further capacity to accept new connections. A planning application is likely to be submitted to Buckinghamshire Council late 2025. It should be noted that should the future application for the replacement substation be unsuccessful and approval given for Statkraft, Statera and Rosefield then these developments will not be able to make their proposed connections to the grid at East Claydon. But in any event no new connections would be available before 2030 at the earliest by which time it is considered that BESS technology will have moved forward and consequently the design of any scheme approved in the near future will be subject to change.

4. The proposal by Noventum Power for a 49.9MW solar farm (Longbreach Solar Farm) on land to the west of Marston Road in the both the GPC area and in North Marston Parish Council's. This site is often referred to locally as Wings Farm.

5.The approved planning Permission for a Solar Farm at Tuckey Farm Winslow

6.The applicant refers to a planning application for a BESS on the Hogshaw Road Granborough, however GPC have been advised that this application has been withdrawn so is of little or no relevance in these considerations. (It does however demonstrate an interest by other companies for electrical infrastructure in the immediate area). It should also be noted that Buckinghamshire Council considered the cumulative impact in its refusal of planning permission for the Statera application by saying "The proposal, which is for a large-scale energy development will be introduced into a strongly agricultural landscape and would be significantly incongruous. It will have, despite the proposed mitigation significant adverse impact on visual amenity and on the landscape character at the site, local and landscape character area levels. Furthermore, the cumulative effects of the proposal with Tuckey Farm (consented permission) and the existing East Claydon substation would lead to cumulative visual and landscape character effects would be

significantly adverse. Together this would change the existing predominantly pastoral landscape to one defined by energy development," GPC considers that this equally applies to the Statkraft application and is many times more relevant when the other proposed developments which have further progressed since the December 2024 decision by Buckinghamshire Council are taken into account.

GPC considers that the cumulative impact should not be limited to the post construction/operational impacts but must also consider the impact on the immediate local environment and wider area resulting from the construction phase itself. As has already been said this and other proposals are all reliant on the proposed new East Claydon Substation which potentially could be operational by 2030/1 (subject to approval). The obvious conclusion is that any or all schemes that are approved will for much of the time have overlapping or comparable construction periods. Each scheme has or will be submitting their own construction plans showing access routes and traffic movements for both normal and abnormal (non-indivisible) loads which may or may not be consider acceptable in their own right. This is a completely unacceptable way of considering these impacts and it essential that the cumulative impact of lorry and other traffic movement numbers etc must be looked not only in respect of the impacts on the roads and road users in the immediate area but also including access routes for example along A413 through Winslow.

Comment: 6. Biodiversity

a. While the habitat BNG of +58% appears positive, it illustrates the low baseline of Grade 3b land; the derisory 7 lines devoted to invertebrates, concluding they are to be scoped out, ignores the facts that the immediate area, Runts Wood in particular, houses over half Britain's butterfly species, including, almost uniquely, all 5 rare Hairstreaks , and over 200 species of moths.

b. The desktop choice of trees and hedgerows destroys the golden opportunity to enhance the area's invertebrates; important local trees, such as Wychelms, Black Poplars and Willows are inexplicably ignored to the detriment of invertebrates.

c. The complete lack of any water feature proposals, such as ponds is a serious deficiency in this application.

d. There is little or no detail of how the ecology enhancements will be surveyed, monitored, or maintained, as is required for 30 years; the LEMP and the CEMP need to specify who will manage the biodiversity and how it will be funded.

Consultation Responses

Arboricultural Officer

The Council's Arboricultural Officer has reviewed the submitted information, including amended details relating to the proposed access track and associated tree protection measures.

The updated information is considered to have addressed the principal concerns previously raised, particularly in relation to the feasibility of upgrading the existing access track within a tree-lined corridor. The submitted Technical Note and section drawings now provide a clear overview of the proposed construction approach, including the raising of the track, use of cellular confinement systems in sensitive areas, and the use of sleeper edging where works are close to retained trees.

The revised Tree Protection Plan (TPP) has also been improved, with Root Protection Areas now shown and the plan set clarified. This represents a material improvement on the previous submission and demonstrates that, in principle, the proposed works can be undertaken without unacceptable harm to retained trees.

However, the Arboricultural Officer notes that the submitted details remain at a relatively high level and do not constitute a construction-level Arboricultural Method Statement (AMS). In particular, further detail is required in relation to:

- working methods within Root Protection Areas;
- installation of sleeper edging and associated anchoring;
- construction of access track widening and passing bays; and
- the routing and installation of services and drainage infrastructure.

On this basis, whilst the proposal is acceptable in arboricultural terms, it is recommended that these matters are secured through a robust pre-commencement condition requiring the submission and approval of an updated Tree Protection Plan and detailed Arboricultural Method Statement prior to the commencement of development.

Subject to the imposition of appropriate conditions securing detailed tree protection and construction methodologies, the proposal is not considered to result in unacceptable harm to retained trees and is acceptable in arboricultural terms.

Archaeology Officer

The Council's Archaeological Service has reviewed the submitted information, including the geophysical survey, trial trenching and Environmental Statement Addendum, and raises no objection subject to conditions. It is acknowledged that the proposed development would result in harm to archaeological interest and therefore to the significance of a heritage asset. In accordance with the NPPF, this harm can be appropriately mitigated through the imposition of a planning condition requiring a programme of archaeological investigation, recording, publication and

archiving to be secured and implemented via a Written Scheme of Investigation, undertaken by a suitably qualified archaeologist. This approach is considered necessary to ensure that the archaeological resource is properly understood and recorded prior to and during development.

Fire and Rescue Service Comments

The Fire Authority raises no objection in principle but advises that the development should be designed and implemented in accordance with Approved Document B (Volume 2), Section B5 and relevant National Fire Chiefs Council guidance. Particular regard should be given to Fire and Rescue Service access, firefighting facilities, water supply, and the management of firefighting water run-off. The applicant is required to engage with Buckinghamshire Fire and Rescue Service (BFRS) and prepare a Fire Risk Reduction and Mitigation Strategy, alongside an Emergency Response Plan covering both construction and operational phases, to ensure fire risks associated with the Battery Energy Storage System (BESS) are appropriately addressed.

The Fire Risk Reduction and Mitigation Strategy should set out measures embedded within the design, construction and operation of the development to minimise fire risk, whilst the Emergency Response Plan should define procedures in the event of a fire, including system isolation, communication protocols, access arrangements, and firefighting measures. The applicant is also expected to address the management of hazardous gases, environmental protection (including containment of firewater run-off), and the handling and disposal of damaged batteries. Ongoing engagement with BFRS is required throughout the project lifecycle, including provisions for site familiarisation and training where necessary.

Ecology

The Council's Ecologist raises no objection to the proposed development, subject to conditions. The submitted ecology information, including the updated Environmental Statement and Biodiversity Net Gain (BNG) assessment, is considered sufficient and addresses previous concerns. The reports provide an accurate assessment of the site's ecological features and set out appropriate mitigation, compensation and enhancement measures, including on-site habitat creation delivering biodiversity net gain in excess of the required 10%. However, these measures must be secured through conditions, including a Construction Environmental Management Plan (CEMP) for biodiversity and a lighting strategy to protect nocturnal species.

The revised BNG strategy demonstrates that gains can be achieved within the site, subject to conditions requiring a Biodiversity Gain Plan, a detailed BNG report and a Habitat Management and Monitoring Plan (HMMP) to ensure long-term delivery and maintenance of habitats. Whilst most ecological impacts can be mitigated on site, impacts on breeding skylark cannot be fully addressed within the red line boundary and will require off-site compensation, either through agreement with landowners or via a financial contribution secured through a planning obligation. Overall, subject to these measures, the development is considered acceptable in ecological terms.

East West Rail Comments

East West Rail Company (EWR Co) advises that the application site falls within land safeguarded for the East West Rail project under Safeguarding Directions issued by the Secretary of State, most

recently updated in November 2025. As such, the Local Planning Authority is required to consult EWR Co on the application prior to determination. The safeguarded land in this location was previously associated with a proposed utility connection between the railway corridor and East Claydon substation to support electrification infrastructure.

However, following ongoing design development and the 2026 design update, EWR Co has confirmed that this utility connection is no longer required due to the adoption of a discontinuous electrification approach. As a result, there is no longer any anticipated interface between the proposed development and the East West Rail scheme. EWR Co therefore raises no objection to the application, and the previously requested safeguarding condition is no longer considered necessary.

Environment Agency

The Environment Agency raises no objection to the proposed development but provides detailed advice in relation to environmental protection, particularly with respect to the Battery Energy Storage System (BESS). It highlights that, in the event of a fire, contaminated firewater or rainfall could enter groundwater and therefore advises that appropriate mitigation and containment measures should be secured, supported by robust emergency response and contingency planning. The Agency also recommends engagement with fire and rescue services, adherence to relevant guidance, and consideration of groundwater abstraction consents where boreholes may be required for firefighting purposes.

Further advice is provided on environmental management during construction and operation, including the use of low-emission non-road mobile machinery, appropriate foul drainage hierarchy (with a preference for connection to the mains sewer), and compliance with environmental permitting requirements where relevant. The Agency also encourages the incorporation of water efficiency measures within the design. Subject to these considerations, the proposal is not considered to raise objections in terms of flood risk, water quality or environmental protection.

Environmental Health

Environmental Health has assessed the proposal for a grid park and raises no objection subject to conditions, noting the potential for noise impacts on nearby residential properties in what is a quiet rural setting with low background noise levels. The submitted Noise Impact Assessment identifies that operational plant, particularly cooling systems and associated equipment, could give rise to significant noise effects at nearby receptors including Tuckey Farm, Tuckey Barn and Monkomb Farm, particularly during night-time periods. Environmental Health agrees with these findings and advises that mitigation measures are necessary.

Subject to conditions securing noise mitigation, including the provision of an acoustic fence and bund, and the careful selection and approval of plant to control sound emissions, the development is considered acceptable in amenity terms. These measures are required to ensure

that noise impacts are adequately controlled and that residential amenity is protected.

Great Crested Newt Officer

The Council's Ecologist raises no objection to the proposed development subject to conditions. Following the submission of additional information, it is accepted that great crested newts are unlikely to be present within the on-site wet ditch. However, to address any residual risk, a condition is recommended requiring the submission and approval of a non-licensed method statement for amphibians, including great crested newts, prior to the commencement of development. This approach reflects the Council's role within the NatureSpace District Licensing Scheme and ensures that appropriate safeguards are in place during construction.

The recommended condition will secure reasonable avoidance measures, including timing of works, pre-commencement checks, ecological supervision where necessary, and procedures to follow should protected species be encountered. This would ensure compliance with relevant wildlife legislation, including the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, and support the Council's duty under the Natural Environment and Rural Communities Act 2006 to conserve biodiversity. Subject to these measures, the development is considered acceptable in ecological terms.

Health and Safety Executive

The Health and Safety Executive (HSE) has advised that it should be consulted via its Planning Advice Web App where the development falls within the consultation distance of major hazard sites or pipelines, or where it meets specified thresholds for uses such as residential, retail, office, industrial or transport development. The HSE also notes its role as a statutory consultee in relation to building safety for relevant buildings and directs the Local Planning Authority to the appropriate processes and guidance. No site-specific objections or technical concerns are raised in this response.

Highways Officer

The Highway Authority raises no objection to the proposed development subject to conditions. East Claydon Road is a classified C-road capable of accommodating the anticipated construction traffic, and the submitted Construction Traffic Management Plan (CTMP) is considered robust, with acceptable forecasts for HGV and LGV movements based on comparable schemes. Construction traffic will be managed to minimise impacts, including staggered delivery hours outside peak periods, defined routing strategies, and measures to reduce cumulative effects. The Environmental Statement confirms that traffic impacts during construction, including overlap with nearby developments, have been appropriately assessed and are acceptable with mitigation.

A new temporary construction access from East Claydon Road is proposed with acceptable visibility splays, alongside a separate permanent operational access for long-term maintenance. These accesses, along with their removal post-construction and associated highway works (including provision for abnormal loads through temporary junction alterations), can be secured through planning conditions and legal agreement. The CTMP includes appropriate measures such as on-site parking, routing, and management of abnormal loads, and further details will be

secured by condition. Once operational, vehicle movements will be minimal and would not have a material impact on the highway network.

Landscape Officer

The Landscape Officer raises significant concerns regarding the proposal, particularly in relation to its scale, siting and resultant effects on the character of the Claydon Valley landscape. The development would introduce large-scale infrastructure into a predominantly open, agricultural valley with limited existing woodland and strong intervisibility, and would represent a notable intensification of an already intrusive energy landscape. While mitigation is proposed, including bunding and woodland planting, it is considered that these measures would themselves appear incongruous and would fundamentally alter the landscape character, resulting in a less open and more enclosed valley. The extent of hardstanding, large battery units and substations is considered to have been underplayed in the submitted assessment, which is not accepted as an accurate reflection of likely effects.

In visual terms, the assessment is considered flawed, with key receptors omitted and impacts underestimated. It is noted that a range of sensitive receptors, including nearby residents, users of public rights of way, long-distance trails, and National Cycle Routes, would experience potentially significant adverse effects, particularly during construction and early operational phases. The assessment is also criticised for relying on optimistic assumptions about screening and seasonal vegetation cover. Overall, the proposal is considered likely to result in major to significant adverse harm to both landscape character and visual amenity, including cumulative impacts when viewed alongside other energy developments in the area.

Lead Local Flood Authority

The Lead Local Flood Authority (LLFA) raises no objection to the proposed development, subject to conditions. Environment Agency surface water mapping identifies areas of high risk across the site, particularly along the central corridor aligned with drainage ditches and in the southern area. While the Flood Risk Assessment (FRA) indicates that some mapped extents may overstate risk due to the omission of an existing culvert beneath the disused railway, it confirms that the site operator will maintain this infrastructure. The FRA concludes that predicted flood depths across much of the site are generally low, and proposes mitigation through raising both permanent and temporary access routes by a minimum of 300mm above modelled flood levels. Temporary access arrangements allow for suspension or diversion of construction traffic during flood events.

The submitted drainage strategy demonstrates, through calculations, that the proposed system will operate without flooding up to the 1 in 100 year plus 40% climate change event. An indicative drainage layout has been provided, although a detailed design will be required by condition, including pipe sizing, gradients and exceedance flow routes to ensure no increased risk to adjacent land. The LLFA advises that the submitted water quality assessment is insufficient and must be revised to demonstrate an appropriate treatment train in line with SuDS principles. Detailed construction drawings of all drainage features, including levels, materials and flow control devices,

will also be required. Due to ground conditions, the use of impermeable liners for SuDS features is specified as necessary and will need to be secured at detailed design stage.

National Grid

No comments received.

Natural England

Natural England raises no objection to the proposed development and advises that, based on the submitted plans, it would not give rise to significant adverse impacts on statutorily protected sites, including Sites of Special Scientific Interest. The proposal is therefore not considered likely to have significant effects on designated nature conservation interests. Natural England highlights that priority habitats and species remain a material consideration, with relevant baseline data expected to be provided where impacts are likely, and notes the use of SSSI Impact Risk Zones as a screening tool for consultation requirements. General advice on protected species and wider natural environment matters is provided separately, but no site-specific concerns are identified in this case.

Rights of Way Officer

No objections from a rights of way perspective.

UK Power Networks

No comments on the application.

Representations

Other Representations

1 comment has been received supporting the proposal:

- The proposal is considered to accord with national and local planning policy.
- It would deliver important energy infrastructure supporting grid resilience and net zero objectives.
- It is asserted that technical concerns (including noise, safety, and environmental impacts) can be adequately mitigated and are addressed by consultees.
- The overall public benefits are considered to outweigh residual harms.

195 comments have been received objecting to the proposal:

Fire safety and public health concerns

- The potential for thermal runaway events, where failure of one battery unit may escalate across the facility.
- Evidence from recent UK and international BESS fires, which are cited as demonstrating real-world risk rather than theoretical possibility.
- Fires may burn for prolonged periods and are not easily extinguished using conventional firefighting methods.
- Fires release toxic and corrosive gases, posing direct risks to residents, emergency responders, livestock, and ecosystems.
- The proximity of the site to residential properties and farmland, including suggestions that nearby homes could be directly affected by smoke or fallout.
- The potential contamination of local watercourses and agricultural land, particularly in the event of firefighting runoff.
- Emergency response concerns include:
- A single site access point, which is considered inadequate in the event of a major incident.
- Limited local fire service capacity in a rural area, increasing perceived response time and risk of escalation.
- A consistent argument is that:
- The regulatory framework for large-scale BESS is incomplete, particularly in relation to HSE oversight and statutory involvement of Fire and Rescue Services.
- As a result such developments should not go ahead.

Cumulative impact and over-concentration of infrastructure

- The proposal contributes to an unacceptable cumulative concentration of infrastructure in the East Claydon/Winslow area.
- A wide range of existing and proposed schemes, including other BESS developments, solar farms, and expansion of the National Grid substation, major infrastructure schemes such as HS2, East West Rail, the incinerator and prison development.
- Resulting in a progressive transformation from agricultural countryside to an energy and infrastructure hub.
- Exceeding the capacity of local infrastructure, environment and communities to accommodate change.
- The application fails to provide a realistic assessment of combined impacts, particularly in relation to traffic, noise, landscape, and ecology.
- There is a lack of strategic planning or coordination, leading to incremental decisions with significant combined effects.

Landscape character, visual impact and rural setting

- The proposal is out of scale with the surrounding landscape, introducing a substantial amount of industrial infrastructure into an open rural setting.
- The extent of land take and density of equipment, resulting in loss of openness and erosion of countryside character.
- The visibility of structures and equipment, particularly from nearby residential areas, public rights of way and elevated viewpoints.
- Landscape mitigation (bunding and planting) would be ineffective in screening development of this scale, particularly in the medium to long term.
- The development would result in a permanent and irreversible change to the character of the area.
- The proposal is an “industrialisation of the countryside”

Traffic, highways and construction phase disruption

- Significant concern is raised regarding the scale and duration of construction traffic impacts.
- High daily vehicle movements, including a substantial proportion of HGVs.
- Existing pressures on the road network arising from HS2 and East West Rail.
- The local road network is described as:

- Narrow, rural in character, and not designed for heavy goods traffic,
- Already subject to damage and disruption.
- Increased risk to pedestrians, cyclists and equestrians, including schoolchildren.
- Road safety issues at constrained junctions and within settlements such as Winslow.
- Physical damage to road surfaces, verges, and street infrastructure.
- Concerns regarding abnormal loads include:
- The need for route alterations, removal of street furniture, and temporary disruption within settlements.
- The submitted transport assessment understates both the scale and significance of impacts, particularly when considered cumulatively.

Ecology, biodiversity and environmental effects

- Representations highlight the ecological value of the site and surrounding area, including:
- Presence of protected and notable species such as bats, barn owls and skylarks.
- Loss and fragmentation of habitats, particularly hedgerows, grassland and farmland ecosystems.
- Disturbance during construction and ongoing operational effects (noise, lighting).
- Potential pollution from fire events, chemical leaks or runoff, affecting soil and watercourses.
- The ecological assessment under-represents the true biodiversity value of the site,
- Mitigation and enhancement proposals are insufficiently detailed or secured.
- The loss of agricultural land is also raised both as an ecological and land-use concern.

Noise, tranquillity and residential amenity

- Continuous operational noise from inverters, transformers, cooling fans and associated equipment would cause noise and disturbance.
- The nature of low-frequency and tonal noise, which is considered especially intrusive in a quiet rural environment.
- Noise would be experienced 24 hours a day, fundamentally altering the character of the area.
- Mitigation measures may not be effective given the propagation of low-frequency noise over distance.
- Concerns relating to cumulative noise impacts with other nearby infrastructure.

Need for the development and planning justification

- Reference to national data suggesting that consented and proposed BESS capacity already significantly exceeds projected national requirements.
- The view that the scheme is driven by commercial opportunity rather than infrastructure need.
- Some respondents argue that:
- The proposal does not represent genuinely “green” development when lifecycle impacts and site-specific effects are considered.
- Overall, the development is characterised by objectors as:
- Unjustified in policy terms and unnecessary in this location.

Flood risk, drainage and land conditions

- Concerns are raised that the introduction of hardstanding and infrastructure could increase surface water runoff.
- Existing local drainage issues may be exacerbated.
- Some representations suggest that:
- The flood risk assessment relies on limited site-specific investigation and does not fully account for cumulative impacts.
- There is also concern regarding:
- The potential for contaminated runoff in the event of a fire, affecting surrounding land and watercourses.

Site selection and land use

- The suitability of the site is strongly contested.
- The use of greenfield agricultural land, rather than brownfield or industrial locations.
- The permanent loss of productive farmland, with implications for food security and rural land use.
- Some representations also raise:
- Concerns that the site has been selected primarily due to grid connection opportunity rather than planning suitability.

Community and socio-economic impacts

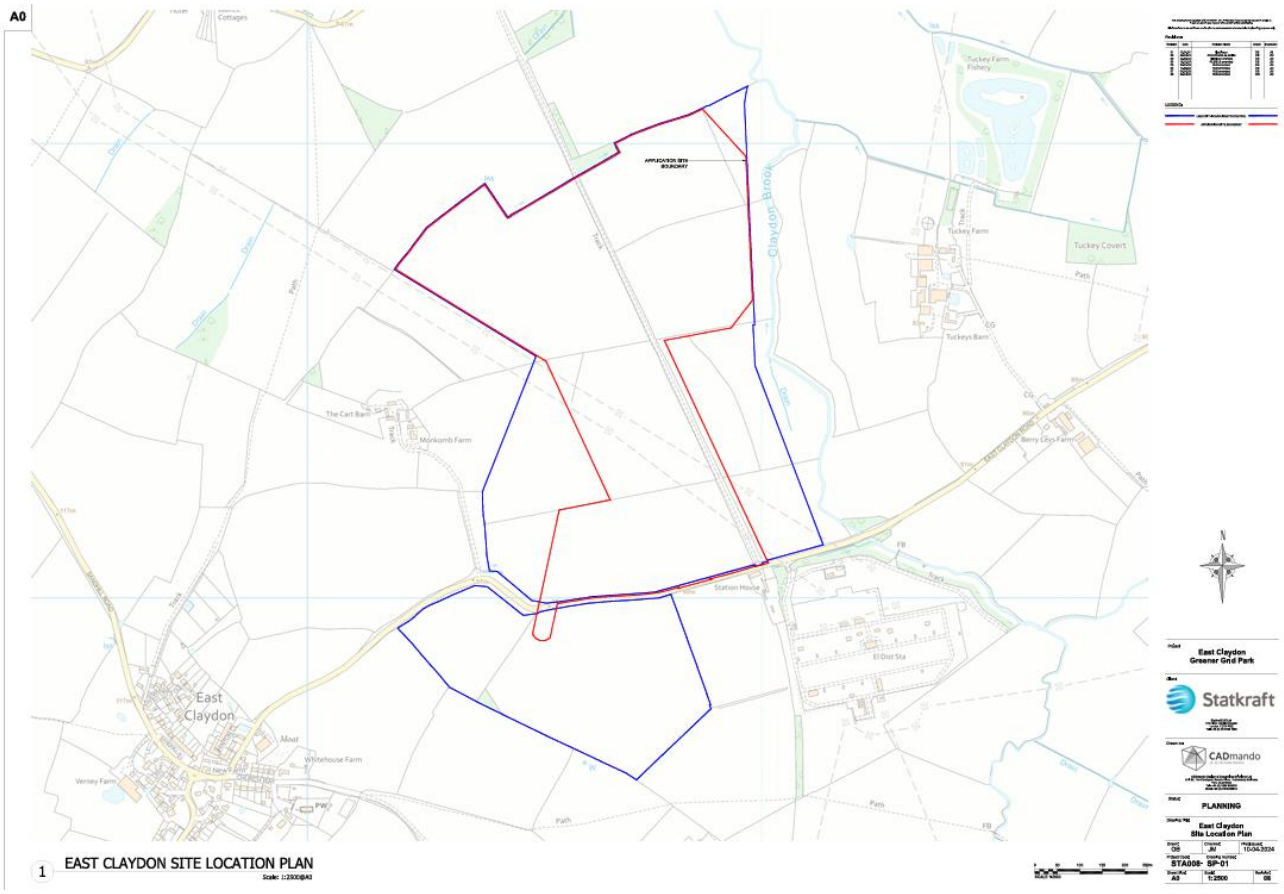
- A number of objections refer to impacts on community wellbeing, stress and mental health, particularly in the context of cumulative development pressure.

- Loss of rural character and quality of life,
- Potential reduction in property values,
- Effects on the attractiveness of the area for residents and visitors.

Process, consultation and information

- Certain technical documents contain inconsistencies or lack clarity, particularly in relation to scheme scale and detail.

APPENDIX B: Site Location Plan



Do not scale – this map is indicative only

APPENDIX C: East Claydon Parish Council Comments

Appendix 2. Strengthening the Assessment of Community Lived Experience and In-Combination Health Effects (AP35)

TECHNICAL NOTE

Rosefield Solar Farm DCO [EN010158]

SUBJECT

Strengthening the Assessment of Community Lived Experience and In-Combination Health Effects

PROJECT NO.

100112394

DATE

16 July 2026

AUTHOR

Georgia Matthews, Anna Morris

DOCUMENT REFERENCE

TNv1

Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
1.0	Rosefield DCO Examination post ISH3	GM	AM	ZH	DK	14.07.26
1.1	Rosefield DCO Examination post ISH3	GM	AM	AN	ZH	17.07.26

Client signoff

Client	Buckinghamshire Council		
Project	Rosefield Solar Farm DCO [EN010158]	**Project No.**	100112394
Client signature / date			

TECHNICAL NOTE

1. Purpose

Buckinghamshire Council (BC) has raised concerns during Examination regarding the extent to which the application documents currently describe the combined lived experience of affected communities and the implications of that experience for health and wellbeing. Most recently, BC reinforced these concerns at Issue Specific Hearing 3 (ISH3).

At ISH3, the Examining Authority (ExA) requested BC to provide a note to the Applicant citing examples of how this community-based analysis has been delivered in the context of other projects (Action Point 35 **[EV9-016]**). This Technical Note (TN) is intended to meet that commitment to the ExA and, in the interests of clarifying BC's request, presents suggestions for how the Applicant could develop the existing application content to better address the concerns raised.

1.1 Context

Whilst individual topic assessments and cumulative assessments have been undertaken and reported within the Environmental Statement (ES), BC's view is that the current assessment framework and mode of reporting of Human Health effects [REP4-062], which has a strong reliance on cross-referencing out to other documents, makes it difficult to understand how multiple environmental changes may be experienced collectively by particular communities. Further, it is difficult to interpret how those combined experiences may manifest as health and wellbeing effects for particular communities and, in turn, provide a sufficient level of confidence to BC (and, ultimately, the ExA) that robust assessment underpins the reporting; and that mitigation proposals will be appropriately targeted and effective in managing the magnitude of impacts to health, wellbeing and quality of life in each case.

A key concern for BC is that the assessment continues to report effects primarily through individual technical disciplines. As a result, it is difficult to understand the overall extent and experience of communities that may be exposed simultaneously to multiple impacts such as:

- changes to landscape character and outlook;
- construction and operational noise;
- dust and other construction disturbance;
- traffic and access changes;
- changes to public rights of way (PRoWs) and recreational routes;
- cumulative visual effects (including with other projects); and
- wider changes to local environmental amenity.

BC has therefore sought a clearer assessment of the in-combination experience of affected communities, including how multiple effects may interact in particular locations and how those combined effects may influence health and wellbeing outcomes and overall significance of effects arising. These concerns were further reinforced through discussions at ISH3 in relation to Topic 12, where the absence of a clear assessment of the in-combination experience of communities emerged as a key issue both for BC and Claydon Solar Action Group.

BC notes that similar concerns have also been reflected in written representations made by local community groups and Interested Parties, including concerns regarding the cumulative experience of environmental change within particular geographic areas, community anxiety regarding those changes and the resulting implications for wellbeing and quality of life.

1.2 Content

This TN sets out:

- the gap BC considers currently exists within the assessment;
- the information already available within the application that could be drawn upon to help address that gap;
- potential approaches for further development;
- examples of approaches that have been used on other projects; and
- BC's view of what additional information would assist the ExA.

The intention is not to seek substantial new technical assessment. Rather, BC considers there is an opportunity to draw together existing findings in a more place-based manner so that the lived experience of affected communities can be more clearly presented, a human health lens demonstrably applied at the place-based scale and the intentions for mitigation more clearly connected to in-combination impacts and effects, to facilitate effective evaluation by the ExA, BC and other Interested Parties.

2. Existing Assessment Information Available Within the Application

BC notes that much of the information required to support development of the health assessment reporting, to convey a clearer understanding of community lived experience, already exists within the Application. For the purposes of this TN, the other concerns that BC has advanced in the Examination (and addressed e.g. under other Items at ISH3) about the Scheme relating to how effects are assessed is not repeated here.

BC recognises that there is some cross-topic analysis relevant to determinants of human health within the ES – this is principally set out in Chapter 17 of the ES, relating to Cumulative Effects Assessment, which is supported by cumulative landscape and visual assessment. BC's concern is that the existing assessment findings are currently presented primarily by individual environmental topic and receptor type, without making the connections across the topics and through to the lived experience within the Buckinghamshire communities.

The cumulative assessment already:

- identifies receptors affected by multiple environmental topics through the Section 17.5 combined effects screening process;
- identifies settlements, recreational receptors and landscape areas where cumulative effects are concentrated;
- includes location-specific cumulative assessments for settlements and recreational routes; and

- contains spatial information, including cumulative visibility mapping, which helps identify areas where cumulative effects overlap.

The assessment reporting does not effectively articulate how multiple effects may be experienced collectively by individual communities. For the human health assessment, this absence of place-based cross-topic analysis and clear presentation of in-combination impacts on determinants of human health impedes the effectiveness of the reporting of human health effects for more sensitive sub-populations within the wider population.

2.1 Identification of Locations Experiencing Multiple Effects

Section 17.5 of Chapter 17 includes an intra-project combined effects screening exercise, which identifies receptors experiencing effects from multiple environmental topics. Examples include:

- Botolph Claydon;
- Granborough;
- North Buckinghamshire Way / Midshires Way;
- Bernwood Jubilee Way; and
- several local PRoW receptors.

These receptors are already identified as experiencing effects from more than one environmental topic and therefore provide an existing basis for identifying locations where multiple impacts coincide.

2.2 Existing Place-Based Assessments

The cumulative landscape and visual assessment contains location-specific cumulative assessments for:

- Granborough;
- Botolph Claydon;
- Steeple Claydon;
- Bernwood Jubilee Way;
- North Buckinghamshire Way / Midshires Way; and
- other recreational and PRoW receptors.

A number of locations repeatedly emerge throughout the cumulative assessment as areas where cumulative effects are concentrated, including:

- Granborough, where significant cumulative visual effects are identified;
- LCA 5.7 Hogshaw Claylands, where significant cumulative landscape effects are identified;
- LCA 7.3 Claydon Bowl, where significant cumulative landscape effects are identified; and,

- Bernwood Jubilee Way and North Buckinghamshire Way / Midshires Way, where significant cumulative effects are identified for recreational receptors.

2.3 Spatial Information Already Available

The Application already includes cumulative ZTV mapping and cumulative landscape and visual assessments, which identify areas of overlapping visual influence and cumulative effect. Whilst these are not community hotspot maps, they provide a substantial evidence base from which locations experiencing overlapping effects could potentially be identified and discussed within the reporting. In BC's view, many of the component parts required for an assessment of community lived experience are therefore already present within the submitted documentation. The principal gap is not the absence of cumulative assessment evidence, but the absence of a clear narrative in the human health assessment that draws those existing findings together, adding in further consideration across other determinants of health (e.g. noise climate, dust raising, transport and PRoW movement network change and disturbance) and explains what they mean for affected communities through a specific human health lens.

3. Approaches to Further Development

BC considers that there are proportionate ways in which the existing cumulative assessment information could be developed and expanded upon to provide a clearer understanding of community lived experience and associated health and wellbeing outcomes. Importantly, these approaches would build on information that is already contained within the submitted Application, particularly the cumulative effects assessment and cumulative landscape and visual assessment.

3.1 Identification of Community Hotspots

BC is keen to see reporting that identifies the specific community locations where multiple impacts are expected to occur concurrently, describes all of those impacts and their respective magnitudes and then applies professional judgement in presenting a narrative appraisal of how impacts to determinants of health may combine to give rise to more acute or different human health effects for the community members. Potential locations could be informed by the existing cumulative assessment, including:

- locations identified through the Section 17.5 combined effects screening;
- settlements that repeatedly emerge within the cumulative assessment;
- recreational routes and PRoW receptors experiencing multiple effects; and
- locations where cumulative landscape and visual effects are already identified.

To this would need to be added the details of relevant topic findings for those locations, to present the full picture of the ways in which determinants of health may be changed by the Proposed Scheme. For example, this would include the outputs from all connected topic assessments, including (but not limited to):

- landscape and visual change;
- noise effects;

- traffic and access effects;
- recreation and PRoW changes;
- construction disturbance;
- community and population effects; and
- other relevant residual effects.

The purpose would not be to undertake a new cumulative assessment, but rather to include within the human health assessment the identification of places where communities are expected to experience a concentration of impacts to determinants of human health that could lead to a greater overall magnitude of impact and resultant effects, different from the experience of the wider population. This analysis would need to be supported by clear connections to the mitigation proposed, in order to present robust reporting of residual human health effects at these geographies. The objective would be to move beyond separate topic findings and provide a more realistic description of how effects may be experienced collectively by residents, community groups and recreational users.

3.2 Application of a Health and Wellbeing Lens

Once those combined experiences have been identified, they should be considered through a health and wellbeing lens. This should include consideration of:

- wellbeing;
- quality of life;
- enjoyment of place;
- environmental amenity;
- recreation and physical activity;
- stress and anxiety associated with environmental change; and
- community resilience and adaptation.

This level of analysis would better demonstrate that the Applicant understands how combinations of environmental effects may influence people, rather than solely describing the environmental effects themselves.

3.3 Relationship with Mitigation

BC considers it particularly important that any community-level assessment clearly explains how identified effects are mitigated in the round. The current assessment makes it difficult to understand how mitigation measures respond to the overall experience of affected communities because mitigation is generally described within individual technical topics. A place-based approach would:

- demonstrate how mitigation is intended to reduce the combined effects experienced by specific communities;
- explain how communities are expected to adapt to environmental change;
- identify any residual concerns that may remain; and
- provide a clearer basis upon which the effectiveness of mitigation can be evaluated.

This would also assist in understanding how commitments framed around consultation and engagement translate into tangible mitigation outcomes and delivery mechanisms.

4. Illustrative Examples

BC is aware of a number of previous assessments that have sought to move beyond the reporting of individual topic effects and instead consider how environmental changes are experienced collectively by communities at DCO project level. The examples attached to this note have been provided because they demonstrate different approaches to identifying locations where multiple effects may coincide, considering the distribution of impacts across communities, and applying a health and wellbeing perspective to the assessment of cumulative and in-combination effects.

Whilst differing in methodology, scale and project context, the examples collectively demonstrate how assessment findings can be organised around communities and places, rather than solely by technical discipline. In doing so, they help provide a clearer understanding of:

- where multiple effects are concentrated;
- which communities may experience those effects;
- how different effects may interact;
- how impacts may influence quality of life and wellbeing outcomes; and
- how mitigation can be considered from the perspective of affected communities.

BC is not suggesting that any single approach should be replicated directly. Rather, the examples are provided as illustrations of methods that have been used elsewhere to improve understanding of community lived experience, the distribution of impacts across communities, and the implications of cumulative environmental change for health and wellbeing. The examples also demonstrate that there is no single prescribed approach. Some focus on identifying geographic hotspots where effects cluster, whilst others focus on understanding the distribution of impacts between communities or considering combinations of environmental effects through a wellbeing lens. BC considers that elements of these approaches may assist the Applicant in developing a proportionate response to the issues identified in this note.

4.1 M5 Junction 10, DCO granted[1]

BC considers the M5 Junction 10 assessment to be the closest example of a place-based cumulative assessment and community hotspot approach. The assessment moved beyond reporting effects by individual technical discipline and instead sought to identify locations where multiple effects clustered geographically. These hotspot locations were then used to develop community-level narratives, which brought together effects from different environmental topics and considered how they may be experienced collectively by affected communities. Of particular relevance to the matters raised in this note is the way in which the assessment:

- identified geographic areas where cumulative effects were concentrated;

[1] TR010063-000482-M5 Junction 10 Examination Library.pdf [accessed 10.07.2026]

- brought together multiple environmental topics within a single assessment framework;
- considered the overall experience of affected communities rather than separate technical effects in isolation; and
- provided a clearer basis for understanding the implications of cumulative environmental change for residents and community receptors.

BC considers this approach provides a useful example of how existing topic-specific findings can be drawn together to support a clearer understanding of community lived experience.

4.2 M60, J18 Simister Island, DCO granted[2]

The M60 Simister Island Population and Human Health assessment provides a useful example of considering the distribution of health impacts across communities and recognising that effects may not be experienced equally by all receptor groups. The assessment sought to consider whether particular communities could experience disproportionate health effects, taking account of differences in baseline health conditions between communities. It also included consideration of how construction effects, such as noise and dust, may interact for communities experiencing multiple impacts simultaneously. Of particular relevance are:

- Paragraphs 12.18.56–12.18.58, which consider interactions between construction-related impacts affecting communities; and
- Paragraphs 12.18.100–12.18.101 and Table 12.38, which consider the distribution of health impacts by community.

The assessment also discusses effects in terms of quality of life and community-level health outcomes. Whilst it does not represent a formal hotspot assessment and does not fully capture community lived experience, it demonstrates how environmental effects can be considered collectively at a community level rather than solely as individual topic effects. The supporting figures also include mapping (Figure 12.3) which is intended to show the spatial distribution of predicted health effects and helps illustrate where impacts are expected to occur.

BC considers this example is particularly helpful in demonstrating how existing assessment findings can be interpreted through a community and health perspective, including consideration of whether some communities may experience a greater burden of effects than others.

4.3 A12 Chelmsford A120 widening, DCO granted[3]

The A12 Chelmsford to A120 Mental Wellbeing Impact Assessment (MWIA) provides an example of applying a specific wellbeing lens to environmental assessment findings. Whilst undertaken within project-specific constraints, the assessment sought to explore the potential implications of combinations of environmental changes for community wellbeing and mental wellbeing outcomes. The assessment therefore moved beyond consideration of individual environmental effects and considered how those effects may influence people and communities. Although not a

[2] TR010064-000278-M60 Simister Island Examination Library.pdf [accessed 10.07.2026]
[3] TR010060-000463-TR010060 A12 Chelmsford to A120 Widening Scheme Examination Library.pdf [accessed 10.07.2026]

community hotspot assessment, the MWIA demonstrates how environmental assessment findings can be interpreted through pathways relating to:

- mental wellbeing;
- quality of life;
- community wellbeing; and
- wider social outcomes.

BC considers this example helpful because it illustrates an alternative approach through which combinations of environmental effects can be considered from the perspective of wellbeing outcomes rather than solely through environmental significance conclusions.

5. Anticipated Value

In BC's opinion, it would be valuable for the Applicant to develop the Human Health reporting further to enable much improved understanding and coherent presentation of how multiple impacts on determinants of human health may be experienced collectively by the communities that BC represents. At present, information relevant to this issue is distributed across a number of technical chapters and assessments with a heavy reliance on cross-referencing and the ability of the reader to make connections.

Whilst BC accepts that the application submission provides evidence regarding individual effects, the current human health assessment makes it difficult to understand the overall experience of particular communities and the manner in which multiple effects may combine within specific locations. Consequently, it is unduly complex for a reader to fully understand the community-based experience of the Proposed Scheme; in turn making it onerous to draw conclusions about whether mitigation approaches are sufficient, targeted and likely to be effective in managing the significance of effects on human health, wellbeing and quality of life.

BC would therefore welcome a proportionate enhancement to the existing assessment which:

- identifies communities or community receptor groups experiencing multiple effects. This is done to a limited extent in the **Environmental Statement Volume 2 Chapter 17: Cumulative Effects [REP2-037]**, however, this focuses only on a small number of topics. It does not bring together the details of the full spectrum of impacts that will be experienced at these receptors, including the impact magnitude and level of significance reported in the topic assessments. This addition would provide clarity on how the Proposed Scheme would be experienced in the round in each named location;
- draws together within the human health assessment, the relevant findings already contained within the application in a clear and consistent basis. The current reporting in the **Environmental Statement Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [REP4-062]** does not name the specific communities and is not supported by the level of granularity set out in the previous bullet, which BC considers essential in informing qualitative judgements of the full extent of impacts on determinants of human health;
- presents a concise place-based narrative describing the likely experience of those communities, based on the impacts on all determinants of health. This is absent from the reporting at present in **Appendix 5.5: Health and Wellbeing Summary Statement [REP4-062]**. Its inclusion would need to build on the preceding suggested additions, clearly demonstrating that the Applicant has carefully considered and consistently reported on the differences of the lived experience for specific communities;

- considers how the combined experience of those impacts may manifest as human health effects and how they may influence health and wellbeing outcomes. The narrative evident in the current reporting in **Appendix 5.5: Health and Wellbeing Summary Statement [REP4-062]** is generalised and focuses principally on the wider population. In order to enable BC and, ultimately, the ExA to easily understand the drivers of potential human health effects in specific geographies, this level of spatially based comprehensive reporting of specific changes to determinants of human health, which should not be achieved through cross-referencing to other topic chapters, is considered essential; and
- clearly explains how mitigation measures are intended to address those effects collectively, tailored to the communities or community receptor groups. Summary devices within **Appendix 5.5: Health and Wellbeing Summary Statement [REP4-062]** currently cross-reference control measures, such as the construction environmental management plan. What is lacking is a clear explanation of what aspects of the control measures cited will specifically focus on limiting the magnitude of relevant impacts on determinants of human health, conveying greater confidence that the mitigation proposed will address the potential effects on human health for communities that are more sensitive to impacts than the wider population as a whole.

In BC's view, this is essential to improve the confidence in the human health assessment, by demonstrably and transparently setting out the Applicant's understanding of and response to how environmental changes may manifest in outcomes relating to:

- stress and anxiety;
- quality of life;
- wellbeing;
- enjoyment of place;
- community amenity;
- recreational experience; and
- the ability of communities to adapt to environmental change.

Importantly, BC considers that bringing this information together in a single location would provide a clearer line of sight between identified impacts and proposed mitigation. This would enable BC, the ExA and affected communities to more effectively evaluate whether mitigation is sufficient when considered from the perspective of those experiencing the effects, rather than solely from the perspective of individual technical disciplines.

BC's view is that much of the underlying evidence necessary to undertake this exercise already exists within the submitted Application, particularly within the cumulative assessment. The principal opportunity is therefore to draw together and interpret those existing findings in a way that more clearly communicates the lived experience of affected communities and the implications of that experience for health and wellbeing.