



AtkinsRéalis



Rosefield Solar Farm (EN010158)

Buckinghamshire Council's Comments on the Applicant's Response to Examining Authority's Second Written Questions

Buckinghamshire Council

July 2026

Introduction

This document sets out Buckinghamshire Council's comments on the Applicant's responses to the Examining Authority's Second Written Questions (ExQ2) **[REP4-082]**, having regard to the material submitted by the Applicant and the Council's Local Impact Report and subsequent submissions.

The responses are provided to assist the Examining Authority in progressing the Examination by clarifying the Council's position on specific matters and identifying where further information, amendment or justification is required.

In doing so, the Council has sought to engage constructively on technical matters and to provide proportionate commentary to support the Examination process.

Where no comment is provided in response to a particular question, the Council's position remains as set out in its previous submissions. The absence of comment should not be taken as agreement with the Applicant's response. Comments are provided only where the Council considers that there is new or additional material arising from the Applicant's response, or where further clarification or emphasis is required to assist the Examining Authority.

It should be noted that the Council is currently awaiting further information and submissions from the Applicant on Ecological matters. This includes in relation to bats and BNG. As such, the Council will provide comment on receipt of the updated documents and information from the Applicant at the next Deadline.

Where matters were addressed during Issue Specific Hearings 1, 2 and 3 (ISH1, ISH2 and ISH3), the Council relies on the evidence given orally and as recorded within its post hearing written submissions. Those submissions should be read alongside this document where relevant.

Unless expressly stated, the content of this document does not represent a change to the Council's overarching position on the Proposed Development. Where agreement is identified on particular technical matters, this should not be taken to indicate that the Council's overall concerns regarding the scheme have been resolved.

Applicant's Responses to Second Written Questions (ExQ2)

Table 2-1.1: General and Cross-topic

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.1.2	National Policy Statement (NPS) EN-3 - glint and glare NPS EN-3 paragraph 2.10.136 states that applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence as part of a mitigation strategy. Has the applicant considered such methods to mitigate glint and glare effects? If so, signpost to where and how it has done so. If not, why not?	Adjusting the tilt and/or azimuth angles is a valid method of mitigation for Glint and Glare effects, but it usually has adverse implications on the energy output from the solar PV modules, as the orientation deviates from the optimum. Where possible, other forms of mitigation (i.e. anti-reflective coating or vegetation screening) is considered first. Adjusting orientation angles is usually reserved for aviation receptors, or for ground-based receptors (i.e. roads, railway lines or dwellings) where other mitigation is not effective. ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4] [APP-082] Section 9 shows no significant adverse effects either on aviation receptors or on ground-based receptors with the proposed embedded mitigation in Section 5.2. Therefore, further mitigation in the form of adjusted orientation angles was deemed not necessary.	The Council has no comment on this question. However, it notes that the paper requested at <u>AP22</u> 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 <u>AP21</u>. In the absence of sufficient time to consider the paper provided, the Council will provide its comment on these documents at the next deadline.

Table 2-2.1 Need, site selection and alternatives

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.2.2	National Policy Statement (NPS) EN-1 (2025) At ISH1, the applicant [REP3-049] drew attention to paragraph 4.11.12 of NPS EN-1 (2025) which states that "The Secretary of State should be satisfied that appropriate network connection arrangements are/ will be in place for a given project regardless of whether one or multiple (linked) applications are submitted." The applicant considers that this has been met in relation to both the solar and BESS as it currently benefits from a grid connection agreement for both the solar and BESS elements, albeit subject to ongoing industry-wide reform. The applicant also considers that the "relevant test is whether there is a realistic prospect of a grid connection, rather than certainty." To the applicant:	The Applicant notes that the Written Summary of Applicant's Oral Submissions at ISH1 [EN010158/APP/8.16] [REP3-049] refers to policy referring to a "realistic prospect", which is an error as both the 2023 and 2026 versions of NPS EN-1 refer to "no obvious reason" in paragraph 4.11.6. It is the case of <i>St Modwen Developments Ltd v Secretary of State for Communities and Local Government and other [2017] EWCA Civ 1643</i> which considered deliverability was concerned with a "realistic prospect" of delivery. In any case, the Applicant considers there is no obvious reason why a Gate 2 network connection would not be possible for the BESS, and also a realistic prospect of delivery of a Gate 2 network connection. The Applicant refers to its responses in the Written Summary of Applicant's Oral Submissions at ISH1 [EN010158/APP/8.16] [REP3-049], and Action Point 5, which set out the existing and proposed connection arrangements for the solar PV and the BESS elements of the Proposed Development. As set out on page 11 of that document, "The Applicant's position is that the Government's current policy position confirms that the need, which is established by the National Policy Statements, for renewable and flexible energy infrastructure, continues to apply to any scheme or component of a scheme which currently has a Gate 1 connection agreement." The Applicant is able to reapply for Gate 2 status for the BESS in a future application round and there is no obvious reason why a network connection would not be secured through re-application particularly as the grant of the DCO (if made) would	The Council note this analysis but, as explained in its response to ExAQ2 [REP4-094] the policy text should not be glossed. The Council note that the position with NESO has not changed, and that the position it explained in its answer to that question remains the case.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	1. Provide further justification for your position that the “relevant test is whether there is a realistic prospect of a grid connection, rather than certainty.” To Buckinghamshire Council: 2. Does the Council agree with the applicant's interpretation of paragraph 4.11.12 of NPS EN-1 (2025) that the test is one of demonstrating that there is a realistic prospect of a grid connection?	further demonstrate “readiness”. The Applicant also refers to its further response to Action Point 5 provided in the Applicant's Outstanding Responses to Actions from ISH1 and ISH2 [EN010158/APP/8.24] submitted at Deadline 4. The Applicant's Grid Connection Statement [EN010158/APP/7.1] [APP-137] confirms that a grid connection agreement for both the solar and BESS components of the Proposed Development is in place. The Applicant is expecting NESO to propose variations to that agreement as part of its Connections Reform process. NESO have provided some clarity on the Connections Reform process outcomes in relation to Gate 1 projects which can be found at: https://www.neso.energy/industry-information/connections-reform/gate-1-information. The guidance explains that Gate 1 agreements will remain in place until the scheme is resubmitted to a future connections application window and meets the criteria for Gate 2, or the developer terminates the project. In Planning for New Energy Infrastructure (the government's consultation response to the new NPSs) available at: https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf, the government explains that “Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals”. The government has therefore committed to “ensur[ing] that language used across government publications does not inadvertently constrain ambitious deployment of clean energy technologies” for example through the application of the Clean Power 2030 capacity ranges to the re-prioritisation of projects as part of Connections Reform. It is the Applicant's view, which is consistent with the attributes of projects which can contribute to the Clean Power 2030 milestone, that this explanation applies to projects of all scales which require consent across all of the planning landscape, i.e. Nationally Significant Infrastructure Project's (NSIPs) and Town and Country Planning Act (TCPA) -consented schemes. Therefore, and within the context of the new connections process, the Applicant maintains that its connection agreement is currently appropriate and also expects it to remain appropriate for both the solar and the BESS. If the connection agreement for any future reason was no longer appropriate, the relevant component of the Proposed Development would not have an agreement to connect to the grid and therefore would not progress.	
Q2.2.4	East Claydon BESS	The proposed location of the Proposed Development's abnormal indivisible load (AIL) access route has been designed to broadly align with the temporary construction track route for the proposed East Claydon BESS. This is to enable coordination with	For the reasons that the Council explains in its ISH3 submission, the Council considers that engagement with and use of the East Claydon BESS (and, indeed, Statera BESS) should have been explored given

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	At ISH1, the applicant confirmed [REP3-049] that it was in discussion with the developer of the proposed East Claydon BESS regarding the potential coordination with the abnormal indivisible load (AIL) access route, identified as Work No. 2B within the application, that may lead to a shared access and reduced land take. 1. If possible, provide drawings of how the shared access arrangement may result in a reduced land take. 2. Has the applicant discussed the potential for the proposed development to connect to the East Claydon BESS to utilise its storage capacity and proposed substation to further reduce land take? If not, why not?	the developer of East Claydon BESS prior to construction and avoid the need for both projects to construct and potentially remove separate access tracks. Preliminary discussions have taken place with the East Claydon BESS developer regarding the potential for shared access, with formal agreement to be sought following DCO consent once the construction programmes for both projects are known. The Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.5] sets out a commitment for the Applicant to consult with other developments including East Claydon BESS at the discharge of requirements phase to manage interactions and reduce any associated potential cumulative impacts. The AIL route as proposed is considered to be efficient in terms of land take compared with a scenario in which the Applicant proposes a different AIL corridor alignment nearby or parallel to the East Claydon BESS temporary construction track route, resulting in separate access being constructed for each project. As this alternative scenario has not been proposed, a drawing is not available for submission. Regarding the potential shared use of the East Claydon BESS and its substation, the Applicant considers that the current policy position is that the need established by NPS EN-1 applies to all schemes or components of a scheme which currently have a Gate 1 connection agreement, whether or not they are within the scope of NPS EN-1. The Applicant has provided its reasoning at Action Point 5 of its Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049] Further, the Applicant notes that relevant government policy is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use (NPS EN-3 (2023) Para 2.10.10). The Proposed Development including both solar generation and flexible storage is aligned with relevant government policy. Further, the Applicant is able to bring forward, under its own control, a solar scheme with associated flexibility. By doing so, the Applicant is able to ensure that the storage component supports the operation of the main solar component of the Proposed Development through reducing wasted output, providing flexibility, maximising use of the grid connection, improving security of supply and reducing carbon emissions from electricity generation. East Claydon BESS has been consented independently of the Proposed Development and is being brought forward by a separate entity and is therefore not controlled by the Applicant. While the Applicant is not aware of obvious reason why East Claydon BESS would not come forward to fruition, the Applicant is not able to rely on delivery of this project to provide BESS capacity for its own scheme.	the specific harms of the Proposed Development and inclusion of the BESS in fields D8 and D9.

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		As with all energy market developments, there are a large number of steps required to take a scheme from consented to operational. Project attrition can occur at any stage. To mitigate the risk of relying on a different project which is not yet delivered, the Applicant is therefore proposing the Proposed Development over which it has total control. The potential for the Proposed Development to connect to the East Claydon BESS to utilise its storage capacity is not appropriate for the following reasons: • Each BESS facility has a separate connection agreement and should be considered as separate projects. • The Proposed Development's BESS is ancillary to the solar PV development and would therefore require additional supporting infrastructure at the East Claydon BESS project to enable the East Claydon BESS to store energy generated by solar PV at the Proposed Development. • There is a high rate of attrition amongst renewables projects and the Applicant cannot rely on the delivery of a separate project over which it has no control. The shared use of the East Claydon BESS substation has been discounted for the same reasons listed above. In addition, a separate substation for the solar PV element of the Proposed Development would be required, which is not likely to be feasible to share with East Claydon BESS given the different technical requirements. Shared use of the East Claydon BESS substation would require a significant amount of additional cabling across Claydon Brook and a much larger substation with additional transformers at the East Claydon BESS site. It would not be likely to reduce the overall land or materials used for both projects and could even result in increased land take and materials used.	

Table 2-5.1: Biodiversity and Ecology

The Council is currently awaiting further information and submissions from the Applicant on Ecological matters. This includes in relation to bats and BNG. As such, the Council will provide comment on receipt of the updated documents and information from the Applicant at the next Deadline.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.5.10	Bechstein's Bat – buffer widths In its deadline 3 submission [REP3-061] at paragraphs 1.20 to 1.27 NE makes the case that to avoid fragmentation, buffers should not be measured from a centre line of existing hedgerows (as currently proposed by the applicant) but on a precautionary basis be based on an agreed width (10-15m either side of a field) on top of the existing ecological features representing the baseline conditions. Please provide a comprehensive response.	The Applicant refers to the response regarding the measurement of hedgerow buffers previously provided within the Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] and secured within the Design Commitments [EN010158/APP/5.9.6]. The spatial extent of development as set out in the DCO Application has similarly been based on offsets from the centreline of the hedgerows. This is considered to be the most consistent data source available across the Site. The approach taken to date has been to increase buffer widths in areas where the corridors are considered to be more sensitive (including, but not limited to, the fields between Shrubs Wood, Decoypond Wood and Sheephouse Wood). The Applicant is willing to review the size of buffers in particular locations as part of the evolving bespoke approach to buffers, and has requested that Natural England make location-specific recommendations. From a bat perspective, the principal function of the buffers is to ensure continued commuting, thus avoiding fragmentation. The hedgerows within the buffers facilitate navigation (as well as providing shelter, insect prey etc), and the buffer width (the distance between Solar PV modules in adjacent fields) mitigates for the presence of the Solar PV modules themselves, should that be the cause of any displacement effect. The hedgerow width/height within any buffer does not affect the distance between Solar PV modules.	The Council supports buffers being clearly defined and measured from the edge of the relevant retained feature where this affects trees, hedgerows or woodlands.
Q2.5.17	Ground nesting birds Provide a detailed response to the concerns raised by CSAG with regard to ground nesting birds set out in paragraphs 5.1 to 5.5 of [REP3-065].	The Applicant has responded to each of the issues raised by CSAG below: <u>Paragraph 5.1</u> ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] has clearly assessed impacts on four assemblages of birds separately (ground nesting birds, non-ground nesting birds, Schedule 1 bird species and wintering birds). Although individual species have slightly different requirements during both the winter and breeding season, the overall impacts	Information on birds was provided to Buckinghamshire Council by the Applicant w/c 20th July, however due to expert availability, comments will be provided alongside final ecology and biodiversity comments at the next Deadline.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		arising from the Proposed Development will be similar (displacement due to habitat modification for example). Therefore, in the case of ornithology, it is proportionate to consider impacts at the level of the overall assemblage and not the individual species. It is common practice in EIA to assess some species groups at the assemblage level where the nature of likely effects is broadly similar. The situation with bats is not the same, and the decision was therefore taken to assess Bechstein's bat and barbastelle separately from the main bat assemblage, given these two species are two of our rarest and consequently listed on Annex II of the Habitats Directive. Wintering raptors, lapwing and golden plover are important aspects of the landscape, hence the County valuation of the assemblage, but it needs to be understood that wintering species are unlikely to show strong fidelity to specific parts of the Order Limits given the wide availability of agricultural land in the landscape. Wintering birds will wander widely in search of foraging. Notwithstanding this, the Applicant has provided mitigation in the form of open uncluttered fields, together with retention of all woodland, the majority of hedgerows and wide grassland buffers ensuring that wintering species can still forage in the locality should they choose to do so. Mitigation measures are detailed in the Outline LEMP [EN010158/APP/7.6.5] and secured by Requirement 7 of the Draft DCO [EN010158/APP/3.1.7]. <u>Paragraph 5.2</u> Section 5.4 of NPS EN-1, Paragraphs 2.10.75 to 2.10.92, Paragraphs 2.10.128 to 2.10.130 and Paragraphs 2.10.154 to 2.10.156 of NPS EN-3 and Section 15 of the NPPF do not require the removal of all ecological effects, nor do they require the direct replacement of habitat for all breeding pairs but they do emphasise the importance of proportionate mitigation. The Applicant has focused on addressing the prime three reasons for the long-term decline of farmland birds, these being: • Lack of invertebrate prey for young during the breeding season • Long term national changes to cropland and grassland management making areas less suitable for nesting reducing breeding success • Loss of winter seed source during the winter months	

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		The effects of habitat loss need to be assessed in the context of the baseline conditions. Skylark and other breeding bird populations in farmland are declining due to modern agricultural practices which reduce breeding productivity and increase mortality. Skylarks can raise up to four clutches (but more typically three) in a breeding season¹ and the number of broods successfully fledged in a year is a strong indicator of a sustainable population, with two to three broods typically needed to sustain a population. Skylarks nest at low density in winter-sown cereals, possibly as few as 0.1 territories per hectare², where they may be limited to a single brood, driven largely by the unfavourable timing of sowing and harvesting; the latter also reducing survivorship. The breeding bird results estimates skylark is nesting at a density of 0.14 per ha within the Order Limits. Only about one in four nests survive in farmland over a season and a nest in winter-sown cereals may raise only 1.2 chicks per nesting attempt. Consequently, despite the widespread occurrence of the species in the landscape, it is likely that the intensive agricultural habitats in the Order Limits (as for most of Britain) support a sink population; that is, a population with a higher death rate than birth rate which may be declining or relies on immigration to sustain it. So even in the absence of solar development, farmland bird populations may be expected to continue to decline. The ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5] has concluded a significant beneficial effect on farmland birds at the local level, which is in line with studies cited under response to Q2.5.12. The mitigation measures detailed in the Outline LEMP [EN010158/APP/7.6.5] will provide alternate areas of breeding habitat that will not be subject to disturbance during the breeding season that can affect bird using existing arable	

1

Royal Society for the Protection of Birds (undated). Land management for wildlife: Skylark *Alauda arvensis* Available at: <https://www.rspb.org.uk/helping-nature/what-we-do/influence-government-and-business/farming/advice-for-farmers-helping-bird-species/skylark-advice-for-farmers> [accessed on 10/10/2024]

2

Donald, P. F. & Vickery, J. A (2000). The importance of cereal fields to breeding and wintering skylarks *Alauda arvensis* in UK. In Aebischer, N. J., et al. (eds) (2000). *Ecology and Conservation of Lowland Farmland Birds*. British Ornithologists' Union.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		cropping where harvesting at inappropriate times of year and crop structure can reduce breeding success. All the mitigation measures need to be considered as a suite of measures collectively (not individually) and are designed to ensure that a viable population of farmland birds can be maintained in the long term. The Applicant's Response to Relevant Representations [EN010158/APP/8.3] [PDA-006] provided evidence that solar schemes designed with biodiversity in mind can support a greater diversity of breeding birds than a typical arable and modified grassland landscape which are the baseline habitats at Rosefield. Accordingly, the Applicant maintains that its assessment of potential impacts on the relevant species is robust and appropriate. <u>Paragraph 5.3</u> Some of the fields to the north of Finemere Wood are gently sloping; however, these fields are not so steep as to prevent arable management and these fields already support low numbers of farmland birds including skylark, yellow hammer and linnet. The Applicant does not consider the topography of these fields a barrier to using them for mitigation, given that ground-nesting species are already present, and believes that, with appropriate management, the carrying capacity can be increased. Also, as outlined above for paragraph 5.2, the mitigation measures for birds need to be considered collectively and not in isolation. <u>Paragraph 5.4</u> As outlined above, National planning policy does not require the removal of all ecological effects, nor does it require the direct replacement of habitat for all breeding pairs but emphasises proportionate mitigation, which is what the Applicant has endeavoured to do. A recent paper³ peer-reviewed by Mr Woodfield (who is acting on behalf of CSAG) has indicated that <i>"mitigation measures should be proportionate and reasonable, so should focus on improving habitat quality at an appropriate scale, rather than attempting to mitigate for all displaced species"</i>. As indicated in the	

³ Solar Energy UK, Solar farms and Skylarks June 2026. <https://solarenergyuk.org/resource/solar-farms-and-skylarks/>

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		responses above the Applicant believes the mitigation proposed is both proportionate and at an appropriate scale. Also, the Applicant does not accept that the fact the Applicant has identified a bird assemblage of County value automatically means that any potential impacts likely to arise to that assemblage are also of County level. In order for potential impacts to be at County level, they would need to significantly adversely affect the bird assemblage of Buckinghamshire as a whole. This would not be the case as per the conclusions reached within the ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.5]. <u>Paragraph 5.5</u> The Applicant has been wholly transparent with regards to the results of winter and breeding bird surveys and is basing its conclusions on the results of standardised, good-practice surveys of the Site. The Applicant notes that, by comparison, paragraph 5.5 contains predominantly anecdotal observations of relevant territory numbers in the area. With regard to golden plover and lapwing, these are wintering species not recorded as breeding. Winter species range widely during the winter months with a large proportion of wintering birds being visitors from the continent. It is unlikely that wintering birds show strong fidelity to specific parts of the Order Limits given the wide availability of agricultural land in the landscape. Consequently, a high degree of displacement can be expected without detriment to the birds, and no significant effects were identified in the assessment. It should be noted Golden plover and lapwing were only recorded once during the 2024 wintering surveys and lapwing were recorded twice during the 2002 surveys and only a single golden plover recorded which does suggest strong dependence on the habitats at the Proposed Development site (see ES Volume 4, Appendix 7.3: Wintering Bird Survey Report (2022) [EN010158/APP/6.4] [APP-089] and ES Volume 4, Appendix 7.11: Wintering Bird Survey Report (2024) [EN010158/APP/6.4.2] [REP1-058]). Notwithstanding this the management of 95ha of open uncluttered grassland will provide both species with additional habitat suitable for winter foraging as well as benefits for breeding species so the Applicant refutes the assertion that it is	

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		relying on the use of farmland outside the Order Limits as mitigation for the Proposed Development.	
Q2.5.19	Cumulative assessment In the latest statement of common ground (SoCG) between you and Buckinghamshire Council [REP3-016], there is still no agreement on the Council's position that a cumulative assessment of the combined losses of arboricultural features across multiple schemes should be undertaken. Provide an update on the latest discussions and positions of the two parties.	The Applicant discussed this comment in a meeting with Buckinghamshire Council on 5 June 2026 whereby Buckinghamshire Council noted that this was related to their concern that the Order Limits of the Proposed Development overlap with the HS2 Act land limits and would place Solar PV modules in areas designated or already planted as woodland by HS2. The Applicant is aware that some parcels of the land within the Order Limits are covered by the Secretary of State for Transport's HS2 Safeguarding Directions made under articles 18(4), 31(1) and 34(8) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. HS2's requirement for this land is for the purposes of mitigation. This land is also the subject of a private agreement between the Claydon Estate, The Department for Transport and HS2 regarding the effect of the Direction. The Proposed Development does not impact any HS2 mitigation planting due to the agreement reached with the Claydon Estate, which switches out areas of mitigation planting within the safeguarded land for replacement land which is not impacted by the Proposed Development. The Applicant has email confirmation from HS2 that this is the case and is in the process of consulting with High Speed Two (HS2) Limited to obtain a formal letter of confirmation which we plan to submit to the Examining Authority, once available. The Applicant is aware of the importance of the areas around Decoypond Wood to bats and has protected commuting routes through appropriate buffers as set out and secured by the Outline LEMP [EN010158/APP/7.6.5]. Buckinghamshire Council have noted this response and this matter is now agreed within the updated Statement of Common Ground with Buckinghamshire Council [EN010158/APP/5.22.4] submitted at Deadline 4.	The Council notes that this matter has narrowed, subject to formal confirmation that Rosefield's arboricultural buffers and mitigation are independently secured. That confirmation is outstanding and the Council will comment at the next deadline.

Table 2-7.1: Cultural Heritage

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.7.1	Archaeological Desk-Based Assessment and Setting Assessment Did the applicant undertake site visits to each of the listed buildings included in the detailed settings assessment [REP2-046] in order to inform its conclusions? If not, why not?	Site visits were undertaken from publicly accessible areas (in line with standard industry practice) for all listed buildings included within the detailed settings assessment. Where listed buildings were not visible from publicly accessible areas, the assessment has been based on an understanding of the listed building and its setting based on desk-based information comprising as relevant: descriptions of heritage assets in the Historic Environment Record, satellite imagery, current and superseded OS mapping, other historic maps, plans and photographs held in the local archives, and the ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4] [APP-115] [APP-116] [APP-117] [APP-118] [REP1-050] [REP1-051] [REP1-052] [REP1-053] [REP1-054] [REP1-055] [REP2-052].	The content of the Statutory list entries for the listed buildings which can be found in the National Heritage List for England is not mentioned in the Applicant's response and this would explain the previous omission from their assessment of the stone walls of Rosefield Farmhouse and Blackmoorhill Farmhouse and the way in which the architecture of the satellite farms responds to Claydon House, although the Council were able to identify the relationship in our walkover survey in the winter. The demolished Shepherd Furze Farm, another Claydon House estate satellite farm removed by the HS2 development, that was further to the west of Rosehill Farm also had a polite stone wall facing Claydon House. The use of stone walls in distant farms to respond to and emphasise the importance of Claydon House that may not have had direct intervisibility with Claydon House suggests that these were meant to be understood as estate farms and the influence and power of the owners appreciated.
Q2.7.4	Botolph House 1. Should the multiple references to "Grade II" Botolph House in Environmental Statement (ES) Chapter 9 [REP2-027] refer to Grade II* as per the Archaeological Desk-Based Assessment and Settings Assessment [REP2-046]? If so, update ES Chapter 9 accordingly. Provide a detailed response to Buckinghamshire Council's response to action point 20 from issue specific hearing 1 [REP3-055] regarding the applicant's assessment of Botolph House. The Council considers that its architecture has not been considered in sufficient detail, to identify the contribution of setting to its significance.	Reference to Botolph House as Grade II listed within ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.3] is a typological error and has been amended to Grade II* in the version submitted for Deadline 4. Buckinghamshire Council considers that the harm to Botolph House is at the middle of the scale of less than substantial harm as the classical house architecture would have had the principal rooms on the first floor, and there would have been an intent for the house to dominate Botyl Road and the countryside below to the east and to the rear. The Applicant considers that the later vegetation planting along Botyl Road, whilst not part of the original design of the setting of the house, reduces the contribution that views out from the house to the east and longer range views of the house from the east make to its significance. Any views from the northernmost first floor rooms over the valley into Fields E21, E22, and E23 already include the existing National Grid East Claydon Substation and are not unaltered. Whilst the Proposed Development would introduce a new substation, BESS and Solar PV modules into this view, there would still be views over the valley towards Quainton Hill and this element of setting (historically available views over the valley and views back towards Botolph House from the east where it was historically visually dominant) will be slightly diminished. The house will remain dominant on Botyl Road (where the vegetation does not screen it from view) and the Applicant concludes that there will be a low level of less than substantial harm to its significance as a result of the changes within its setting slightly compromising its significance. This would result in a slight adverse effect which would not be significant.	Views over Fields E21, E22 and E23 would only partially include the National Grid Substation which would be off to the left of these views in field SA54, beyond the north boundaries of field E11 and E10. Indeed, Sion Hill Farm sits on a lower promontory that would partly obscure the substation from the first floor views from Botolph House and from the grassed space opposite it where the relationships would also be appreciable. The change to this important element of the contributory setting of Botolph House would be from more or less original views to the east where there is no screening, with a modern substation to the left of the view, to a view in which the Rosefield Substation, Main Collector Compound and field E23, with its solar PV array, would form a band of modern development across the vast majority of the surviving historic views across the valley in both directions. Viewpoint 13 is close to the location of these views (although not directly in line) and provides an indication of existing and anticipated views.

Table 2-10.1: Health and Wellbeing

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.10.1	Health Effects Report How do you respond to Buckinghamshire Council's concern, expressed in its response to the Examining Authority's (ExA) written question 1.13.1 [REP2-090], that while Annex A of Environmental Statement (ES) Appendix 5.5: Health and Well Being Summary Statement [REP2-050] improves clarity of health assessment reporting, the presentation of the assessment as an Annex to an Appendix within the ES fails to afford the assessment equivalent prominence within the ES as other topics that also feature as named topics in the relevant Environmental Impact Assessment legislation?	The Applicant considers that as an Appendix to the ES, ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] and the Health Effects Report at Annex A are both certified documents that have according weight alongside other elements of the Environmental Statement including the 'stand alone' chapters. The approach taken has been in accordance with the Scoping Report (ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]). The Planning Inspectorate agreed that human health could be scoped out of the ES (ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080], p18) on the basis that the ES should still clearly set out potential impacts to human health from the Proposed Development and cross-reference where impacts are considered and assessed within other relevant chapters of the ES, with any relevant mitigation measures secured within the Outline CEMP [EN010158/APP/7.2.5]. Consideration of health impacts is incorporated into assessments of air quality, landscape & visual, noise & vibration, population, traffic & transport, land & groundwater, water and glint & glare within the relevant Environmental Statement topic chapters and assessments as appropriate, as well as ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6]. The Applicant has considered whether it is beneficial to include a short statement in individual sections of the Non-Technical Summary (NTS) (or a new stand-alone chapter of the NTS) but is generally of the view that the purpose of the ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.6] is to address the health implications of the assessments considered by the ES chapters, which have not changed. The individual NTS chapters for each topic therefore remain as produced to-date.	The Council respectfully disagrees with the Applicant's view, including with regard to the NTS. The human health reporting [REP4-062] and [REP4-063] does identify some significant adverse effects as not fully mitigated (i.e. using the wording "mitigated as far as practicable"), which are not then reported in the corresponding part of the NTS.

Table 2-11.1: Landscape and visual (including good design)

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council comments
Q2.12.2	Moderate (not significant) effects At issue specific hearing 1 (ISH1) [REP3-049], the applicant stated that only a limited number of receptors (two settlements and 12 residential receptors) were identified as moderate, but not significant. Provide a summary table that identifies all receptors where a conclusion of moderate adverse effects has been reached by the applicant. This should clearly identify whether the effects are deemed to be significant or not significant by the applicant.	The Applicant was quoting from reference Q1.15.13 in Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13] [REP2-087] which states that, <i>"Long-term effects judged as moderate and not significant are noted for two settlements and twelve residential receptors. With the exception of LCA 9.2: Quainton Hill, all other long-term moderate effects, as assessed for LCT/LCA, PRoW, trails and visitor attractions are judged as significant."</i> The table below provides a summary of the relevant moderate effects as set out in Table 10.14 in ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.3]. The year 10 effects noted below correspond to long-term effects.	Buckinghamshire Council notes the introduction of the table which provides a summary of Table 10.14. The remaining concern which Buckinghamshire Council still have is with the classification in the Residual Effect (with additional mitigation) column, in which there are a significant number of receptors classified as Moderate Adverse Not Significant. This is likely to be to as a result (among other things) of the way in which a three-point assessment scale has been set up in the methodology, where normally where a receptor has a Moderate Adverse finding this is then classified as Significant. The concern is therefore fundamentally attributed to the way in which the methodology has been established which has in the opinion of Buckinghamshire Council resulted in a mis-alignment with the anticipated findings and an underestimation of effects.

ExQ2 Ref	Question	Applicant's Response					Buckinghamshire Council comments																																																																														
		<table><tr><th>Receptor</th><th>Phase</th><th>Sensitivity of the receptor</th><th>Magnitude of effect</th><th colspan="2">Residual effect (with additional mitigation)</th></tr><tr><td rowspan="2">Landscape fabric (woodland, trees and hedgerows)</td><td>Operation (Year 1)</td><td>High/medium</td><td>Slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td>Operation (Year 10)</td><td>High/medium</td><td>Moderate/slight</td><td colspan="2">Moderate beneficial Significant</td></tr><tr><td>LCA 5.7: Hogshaw Claylands</td><td>Operation (Year 1)</td><td>Medium/low</td><td>Substantial/moderate</td><td colspan="2">Moderate adverse Significant</td></tr><tr><td rowspan="2">LCA 7.3: Claydon Bowl</td><td>Operation (Year 10)</td><td>Medium/low</td><td>Substantial/moderate</td><td colspan="2">Moderate adverse Significant</td></tr><tr><td>Operation (Year 1)</td><td>Medium</td><td>Substantial/moderate</td><td colspan="2">Moderate adverse Significant</td></tr><tr><td rowspan="3">LCA 9.2: Quainton Hill</td><td>Operation (Year 10)</td><td>Medium</td><td>Substantial/moderate</td><td colspan="2">Moderate adverse Significant</td></tr><tr><td>Operation (Year 1)</td><td>Medium</td><td>Moderate/slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td>Operation (Year 10)</td><td>Medium</td><td>Moderate/slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td rowspan="2">1-2 Calvert Cottages</td><td>Operation (Year 1)</td><td>High</td><td>Moderate/slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td>Operation (Year 10)</td><td>High</td><td>Slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td rowspan="2">3 Calvert Cottage</td><td>Operation (Year 1)</td><td>High</td><td>Slight</td><td colspan="2">Moderate adverse Not significant</td></tr><tr><td>Operation (Year 10)</td><td>High</td><td>Slight/negligible</td><td colspan="2">Minor adverse Not significant</td></tr><tr><td>4-5 Calvert Cottages</td><td>Operation (Year 1)</td><td>High</td><td>Moderate/slight</td><td colspan="2">Moderate adverse Not significant</td></tr></table>					Receptor	Phase	Sensitivity of the receptor	Magnitude of effect	Residual effect (with additional mitigation)		Landscape fabric (woodland, trees and hedgerows)	Operation (Year 1)	High/medium	Slight	Moderate adverse Not significant		Operation (Year 10)	High/medium	Moderate/slight	Moderate beneficial Significant		LCA 5.7: Hogshaw Claylands	Operation (Year 1)	Medium/low	Substantial/moderate	Moderate adverse Significant		LCA 7.3: Claydon Bowl	Operation (Year 10)	Medium/low	Substantial/moderate	Moderate adverse Significant		Operation (Year 1)	Medium	Substantial/moderate	Moderate adverse Significant		LCA 9.2: Quainton Hill	Operation (Year 10)	Medium	Substantial/moderate	Moderate adverse Significant		Operation (Year 1)	Medium	Moderate/slight	Moderate adverse Not significant		Operation (Year 10)	Medium	Moderate/slight	Moderate adverse Not significant		1-2 Calvert Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant		Operation (Year 10)	High	Slight	Moderate adverse Not significant		3 Calvert Cottage	Operation (Year 1)	High	Slight	Moderate adverse Not significant		Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant		4-5 Calvert Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant		
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ExQ2 Ref	Question	Applicant's Response					Buckinghamshire Council comments
			Operation (Year 10)	High	Slight	Moderate adverse Not significant	
		Granary Cottage	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant	
		Pond Farm	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High	Slight	Moderate adverse Not significant	
		The Old Dairy	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant	
		Knowlhill Farm	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High	Slight	Moderate adverse Not significant	
		1-2 Blackmorehill Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High	Slight/negligible	Minor adverse Not significant	
		4-5 Catherine Cottages	Operation (Year 1)	High	Moderate/slight	Moderate adverse Significant	
			Operation (Year 10)	High	Slight	Moderate adverse Not significant	
		6-7 Catherine Cottages	Operation (Year 1)	High	Substantial/moderate	Major/moderate adverse Significant	
			Operation (Year 10)	High	Moderate/slight	Moderate adverse Not significant	
		Bernwood Farm	Operation (Year 1)	High	Substantial/moderate	Major/moderate adverse Significant	
			Operation (Year 10)	High	Substantial/moderate	Major/moderate adverse Significant	

ExQ2 Ref	Question	Applicant's Response					Buckinghamshire Council comments
		Station House	Operation (Year 1)	High	Moderate/slight	Moderate adverse Not significant	
		Botolph Claydon	Operation (Year 10)	High	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High/medium	Slight	Moderate adverse Not significant	
		Granborough	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant	
			Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Not significant	
		Quainton Road/Claydon Road	Operation (Year 1)	Medium	Moderate	Moderate adverse Not significant	
			Operation (Year 10)	Medium	Slight/negligible	Minor adverse Not significant	
		North Buckinghamshire Way/Midshires Way	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant	
			Operation (Year 10)	High/medium	Slight	Moderate/minor adverse Not significant	
		Swan's Way/Outer Aylesbury Ring	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant	
		Three Points Lane and the PRow extending to HS2	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant	
			Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Not significant	
		PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3	Operation (Year 10)	High/medium	Slight	Moderate/minor adverse Not significant	
			Operation (Year 1)	High/medium	Moderate	Major/moderate adverse Significant	
		Claydon House	Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant	

ExQ2 Ref	Question	Applicant's Response					Buckinghamshire Council comments
		Hogshaw Farm and Wildlife Park	Operation (Year 1)	High/medium	Moderate/slight	Moderate adverse Significant	
			Operation (Year 10)	High/medium	Moderate/slight	Moderate adverse Significant	
			Operation (Year 1)	High/medium	Moderate	Moderate adverse Significant	
			Operation (Year 10)	High/medium	Moderate	Moderate adverse Significant	
Q2.12.3	Assessment of effects Provide examples of other Nationally Significant Infrastructure Projects that have been approved by the Secretary of State that adopted the same or similar approach to arrive at conclusions on the significance of effects as the applicant, including the use of a three-point scale to determine sensitivity and a four-point scale for magnitude. Explain why any such cases are applicable to the Rosefield Solar Farm project.	Both the consented Byers Gill Solar DCO (Reference: EN010139, consented 23 July 2025) and Springwell Solar DCO (Reference: EN010149, consented 8 April 2026) used the same methodology as the Proposed Development with a three-point scale to determine sensitivity and four-point scale for magnitude. The methodology has been developed over a number of years of professional practice and has been used for a large number of LVIAs over a wide array of project types, including renewable energy of various scales (large scale wind, solar, BESS, energy from waste), residential, minerals, commercial and industrial projects. The same methodology has been used for LVIA submission in numerous projects at Public Inquiries and Hearings. The Applicant therefore submits that this same methodology is equally applicable for use on the Proposed Development.					Buckinghamshire Council acknowledge the example provided but it is still our opinion that the adoption of the five-point scale is the most appropriate for this assessment. The five-point scale would allow for a greater degree of scope when assessing predicted impacts and likely effects. It avoids the issues identified below (including the underassessment of effects), and is an approach typically used in DCOs and local planning.

Table 2-12.1: Noise and Vibration

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.13.1	Background noise The Examining Authority (ExA) notes the continued concern of Buckinghamshire Council regarding the relative increase in noise levels to some receptors due to low background noise levels. The applicant explained at issue specific hearing 1 (ISH1) [REP3-049] that its approach in considering absolute noise levels is appropriate and consistent with other nationally significant infrastructure projects (NSIPs). The applicant also stated that it was not reliant only on the 35 decibel (dB) threshold specified in requirement 14 (operational noise) of the draft Development Consent Order (dDCO) [REP3-006] but that other measures in the outline Operational Environmental Management Plan (oOEMP) [REP3-032] would also manage noise. The oOEMP would be subject to approval by Buckinghamshire Council under requirement 12 of the dDCO. To the applicant: 1. Provide examples of other consented NSIPs that have applied a similar approach in low background noise areas. 2. Provide comments on how the applicant's approach complies with National Planning Policy Framework (NPPF) paragraph 198 which requires applicants to "mitigate and reduce to a	1. Examples of other consented NSIPs that applied a similar approach due to low background sound levels are presented below: - Springwell Solar Farm [EN010149]; - East Yorkshire Solar Farm [EN010143]; - Tillbridge Solar Project [EN010142]; - Stonestreet Green Solar [EN010135]; - Cottam Solar Project [EN010133]; - West Burton Solar Project [EN010132]; - Gate Burton Energy Park [EN010131]; - Mallard Pass Solar Project [EN010127]; - Heckington Fen Solar Park [EN010123]; and - Longfield Solar Farm [EN010118]. 2. Noise generated by the Proposed Development has been mitigated and potential adverse impacts reduced to a minimum. This has been achieved through the introduction of mitigation measures (embedded and additional), which ensure that the lowest-observed-adverse-effect level (LOAEL) is not exceeded at surrounding residential receptors. Avoiding exceedances of the LOAEL threshold would constitute a situation whereby noise can be heard, but does not cause any change in behaviour, attitude or other physiological response, in compliance with NPPF paragraph 198. There may be a slight effect on the acoustic character of the area but not such that there is a change in the quality of life. The mitigation measures adopted in the operational phase assessment comprise of: - Maximising the separation distances between proposed noise emitting infrastructure and surrounding sensitive receptors. - Orientating noise emitting equipment to minimise off-site emissions. - Use of low-noise equipment. - Introduction of noise barriers around the BESS container areas, Central Inverters and Rosefield Substation. - Introduction of enclosures and/or barriers around the main transformers within the Rosefield Substation and Satellite Collector Compound.	The Council note that it has updated its position in the SoCG on this issue. For the reasons set out therein the Council remains concerned about the effect that certain receptors experience where the existing background is tranquil and the magnitude of change is considerable as a result of the Proposed Development. Attention is drawn to the Council's position in the SoCG.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	minimum potential adverse impacts resulting from noise from new development..." To Buckinghamshire Council: 3. To what extent would the wider control measures in oOEMP that would be subject to approval by the Council provide assurance that the relative increase in noise from low background levels could be adequately addressed?	- Operational phase noise monitoring to demonstrate compliance with specified noise thresholds. As noted in Section 13.13 of ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3], the operational phase assessment is based on all plant/equipment running at full duty during both daytime and night-time periods. This is likely to overestimate the noise emissions from the Site, as a reduced operating duty would be expected during periods of the night, when baseline sound levels are lowest, due to darkness and temperature fluctuations resulting in lower cooling demands. The level of noise reduction would be determined once plant/equipment specifications are defined during the detailed design stage. As a result, the difference between the rated noise levels and the typical background sound levels is expected to be lower than those presented.	
Q2.13.2	Embedded mitigation - offset In relation to the proposed 50m offset embedded noise mitigation, the applicant's response to Examining Authority's first written questions (ExQ1) Q1.16.8 <u>[REP2-087]</u> states that "due to the quantity of noise sources and mitigation measures applied, combined with the complexity of noise propagation pathways from multiple sources operating simultaneously, it is not appropriate to specify a fixed offset distance at which components must be sited to ensure adverse impacts would be avoided." If so, why has the applicant specifically identified an offset of 50m between specific components and residential properties as well as from the southern boundaries of fields D8 and D9 and the eastern boundary of field D9 in the Design Commitments <u>[REP3-010]</u>?	The 50m offset is a minimum separation distance that was used to inform the assessments within the Environmental Statement. Varying offset distances, in conjunction with other mitigation measures, have been adopted in the noise assessment to avoid significant adverse effects. These are secured within the Works Plans [EN010158/APP/2.3.5] and Design Commitments [EN010158/APP/5.9.6].	The offset is considered typical.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.13.3	Embedded mitigation - use of equipment with low noise emissions The applicant's response to ExQ1 Q1.16.9 [REP2-087] states that "The selection of equipment will be subject to the design team/contractor responsible for the detailed design of the proposed development. This decision can be balanced with other factors such as equipment size, efficiency, availability and cost..." 1. Would Buckinghamshire Council have any input into the decision not to use equipment with low noise emissions? If not, why not? 2. Can the use of equipment with low noise emissions be considered as embedded mitigation if a contractor can discount it based on cost at a later date?	1. Use of equipment with low noise emissions where feasible is identified as an embedded mitigation measure within Table 13.12 of ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3], which was the subject of ExQ1 Q1.16.9. The mitigation measures adopted to achieve the operational noise rating levels set out in the Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.5] would be subject to review at detailed design stage by Buckinghamshire Council, as stipulated by Schedule 2 of the Draft DCO [EN010158/APP/3.1.7]. 2. Based on the design that has been assessed within ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3], the adoption of equipment with low noise emissions is required to achieve the significance criteria adopted for the operational phase assessment and has therefore been included as an embedded mitigation measure. As noted in the ES chapter, it is anticipated that the noise emitting equipment will be refined as part of the detailed design, which may include consideration of alternative equipment specifications, locations and numbers of noise emitting equipment within the Order Limits. As the design develops, the noise control strategy will also be refined, accounting for equipment with low-noise emission and other measures, as appropriate, sufficient to achieve the adopted acoustic criteria, as secured by Schedule 2 of the Draft DCO [EN010158/APP/3.1.7]. The low noise emissions that have been used to inform the assessment presented in ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.3] are within the range of available product specifications which are technically appropriate for the Proposed Development; it is not reliant on future technological advancements.	Equipment with lower noise emissions is a recognised way to mitigate effects. The Council expects the Applicant to comply with the NPSE (including mitigation of LOAEL effects).
Q2.13.4	Public Rights of Way (PRoW) users Provide a further assessment of noise effects on PRoW users as advocated by Buckinghamshire Council at paragraph 81 of its post ISH1 note [REP3-056] or provide further justification for not doing so.	Within paragraph 81 of Buckinghamshire Council's post ISH1 note [REP3-056], reference is made to the WHO Guidelines for Community Noise, specifically the following requirement for outdoor areas in parkland and conservations areas: <i>"existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low".</i> Buckinghamshire Council advise that this requirement should be applied to the operational phase noise assessment for PRoW users. This is contested by the Applicant, on the basis that the PRoW do not constitute either parkland or conservation areas in their own right, nor are they located within any defined parkland or conservation areas. There are no quantitative assessment thresholds for the determination of adverse effects on PRoWs.	The Council remain concerned that many of the relevant PRoW in the area in and around the Proposed Development experience high levels of tranquillity. The Applicant's approach to background noise and to measuring effects in respect of PRoW undervalues this, and also fails to reflect upon the specific uses that PRoW are put to by the public. The Council's position in its ISH1 note remains the case, and the Council supports the WHO Guideline it quotes as the most suitable guidance given the use and nature of PRoWs (including the Bernwood Jubilee Way, which is notable because of its significance as a public route).

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		Notwithstanding this, the resultant operational phase noise levels experienced by PRow users have been subject to mitigation, through the adoption of low-noise emitting equipment and perimeter barriers, as secured by Outline OEMP [EN010158/APP/7.3.5]. The baseline ambient sound levels along PRowS and permissive paths within the Order Limits will be influenced by a variety of sources, which may include, but not be limited to, birds, insects, livestock, wind-blown foliage and occasional aircrafts. On the basis of the residual noise levels generated by the Proposed Development post-mitigation and the acoustic masking effects of existing sound sources, perceptible noise from the Proposed Development during operation would be localised, rather than widespread along the PRow/permissive path network.	

Table 2-13.1: Population

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.14.1	Primary construction compound in field E21, E22 or E23 - At what stage would the applicant determine whether the primary construction compound in parcel 3 as identified in the Works Plans [REP3-005] and figure 3.8 of Environmental Statement (ES) Chapter 3 Proposed Development Description [REP1-049] would be located in either field E21, E22 or E23? - What factors would inform the decision regarding the location of the primary construction compound and would it be subject to consultation with relevant landowners and tenants? - Aside from the grazing corridor proposed for Field E23 in the	- Following ISH1 the Applicant can commit to moving the Primary Construction Compound out of Field E23 and instead place it within Fields E22 or E21 to mitigate the potential effect for Preston Farms Ltd. This is shown on the revised ES Volume 3, Figure 3.8: Indicative Location of Primary and Secondary Construction Compounds [EN010158/APP/6.3.5] submitted at Deadline 4. Post consent and when compiling the detailed construction schedule once the details of the final design are known, the Applicant would determine the final extent of where the Construction Compound will be positioned within Fields E22 or E21. - The final location of the Construction Compound will be determined within Fields E22 or E21 primarily through consideration of health and safety implications, proximity to flood zones, the best access routes and the position which provides the longest site setup before having to remove and build over the existing compound area. It is likely that most of Field E21 will be used as the Primary Construction Compound for Parcel 3, however this will be confirmed at post-consent stage. This will be discussed with relevant landowners and tenants prior to confirming the location. - As confirmed in the response to Point 1 above, the Applicant can commit to removing Field E23 from the Primary Construction Compound siting zone. Furthermore, the Preliminary Biosecurity Note [EN010158/APP/8.28] (which has been prepared in response to the additional biosecurity details provided by Preston Farms Ltd and TCS Biosciences Ltd at Deadline 3 [REP3-067]) sets out the approach to biosecurity throughout the construction phase. Site Access Procedures would be in place to ensure biosecurity protocols are	This is noted. The Council takes this opportunity to reinforce the request made at ISH3 and accepted by the Applicant to provide further granular analysis in the reporting that underpins the findings of the Population assessment, through a technical appendix. The Council would expect information set out here to be reflected in the description of relevant mitigation and design connected to the relevant receptor (i.e. Preston Farms Limited and TCS Biosciences). The Council will comment further, as appropriate, once the requested appendix is made available to the Examination.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	Design Commitments [REP3-010], what other mitigation measures are proposed to address the potential effects of the compound on the use of field E23 by Preston Farms Limited? In answering this question, have regard to the additional information provided at deadline 3 by Preston Farms Limited regarding its use of field E23 [REP3-067].	followed, enforcement of these measures would be a contractual obligation with site contractors.	
Q2.14.2	Knowl Hill Farm – layout of the proposed development Provide further explanation and justification of the proposed layout of the proposed development in the vicinity of Knowl Hill Farm having regard to matters raised in Mr Claridge's deadline 3 submission [REP3-069]. The Examining Authority (ExA) notes that the applicant's response to issue specific hearing 1 (ISH1) action point 31 on this matter [REP3-049] reiterates its position that the layout and use of fields B18 and B19 was informed by the Residential Visual Amenity Assessment [APP-114]. Did the applicant also consider the implications for farming operations in determining the layout? If so, identify where this is referenced in the examination library. If not, why not?	The Applicant has provided a full response to Action Point 31 in the Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049] to clarify the design reasons underlying the proposed layout in Fields B18 and B19. The Applicant has set out in the Written Summary of Applicant's Oral Submissions at the Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107] how implications for the Claridges' farming operations were considered in the design of the Proposed Development, this includes the following: - The Applicant has included an indicative track across plots 3/11, 3/13, 3/14, 3/15, 3/16, 3/18,4/1 and 4/2 which can be utilised by the Claridge family for farm access purposes to assist with their movements around the farm holding. The final choice of corridor is referenced at paragraphs 5.5.28 and 5.5.29 of the Design Approach Document [EN010158/APP/5.8.3] [CR1-014]. - During design stages 1 and 2, a southern cable route and construction access track option located south of Home Wood was considered. However, among the factors taken into consideration when adopting the northern option at Design Stage 3 was the ability to keep construction traffic further from Knowlhill Farm thereby limiting traffic disruption to the Claridge family. - In order to avoid access to Parcel 1A which would pass through land which will continue to be farmed by the Claridge family, a new access route around Romer Wood (plot 2/7) was included at Design Stage 3, which follows the existing HS2 access route. This removes the need to pass via Knowlhill Farm via plots 2/3 and 2/4 unless necessary for reasons beyond the Applicant's control e.g. the access route through plot 2/7 is obstructed by HS2 works. This is included at paragraph 5.5.31 of the Design Approach Document [EN010158/APP/5.8.3] [CR1-014]. The loss of B18 from agricultural use would be compensated via a land swap agreement for which Heads of Terms have been signed and the solar PV proposed in Field B18 does not restrict the use of adjacent land. As set out in ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4] it is	Noted. The Council takes this opportunity to reinforce the request made at ISH3 and accepted by the Applicant to provide further granular analysis in the reporting that underpins the findings of the Population assessment, through a technical appendix. The Council would expect information set out here to be reflected in the description of relevant mitigation and design connected to the relevant receptor (i.e. Knowl Hill). The Council will comment further, as appropriate, once the requested appendix is made available to the Examination.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		considered that the effects on agricultural businesses and landholders, which includes Mr Claridge's farming operations, would be not significant.	
Q2.14.8	Assessment of residual effects on agricultural businesses and landholdings and other non-agricultural businesses Environmental Statement (ES) Chapter 14 Population [REP2-033] states that the value (sensitivity) of non-agricultural business and development land as a receptor is high or very high. The magnitude of change is given as minor (except for one topic area for one receptor - Hogshaw Farm and Wildlife Park) during construction and slight/negligible or minor (except for moderate effects experienced by two receptors/receptor groups for visual amenity only) during operation. The sensitivity and magnitude for all receptors is not specified. 1. Identify the sensitivity and magnitude of change for each individual receptor considered within the assessment of other non-agricultural businesses. 2. In the context of concerns raised by TCS Biosciences Limited regarding the potential effects on their operation, provide further justification for the applicant's identification of a minor magnitude of change during the construction phase and slight/negligible or minor during operation and overall conclusions. In doing so, have regard to any related potential implications for the NHS that	1) Sensitivity and magnitude of change for each individual receptor considered within the assessment of other non-agricultural businesses In-line with the approach to sensitivity set out in Table 14.21 of ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4], the sensitivity of non-agricultural receptors draws on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') and is influenced by changes to environment or access such that significant effects may: a) affect viability (<u>Very High</u>); b) affect operating practices, with limited capacity to absorb or respond to change (<u>High</u>); c) affect operating practices but not to a significant degree due to capacity to absorb or respond to changes (<u>Medium</u>); or d) affect operating practices such that significant effects may influence operating practices to a slight or hardly perceptible degree (<u>Low</u>). As such, assessments are based on the factors that the business relies upon for its viability or operating model. In one case (TCS Biosciences Ltd), the potential for effects on viability are considered to meet the 'very high' criteria – the business is located partly within the Order Limits, so will experience changes in land and access, and interaction with Proposed Development's infrastructure directly, as well as experiencing immediate environmental effects. Its operating model is such that it relies upon access to and within land affected, and a strictly controlled environment. All other non-agricultural receptors – including Hogshaw Farm and Wildlife Park, and Claydon House (and businesses within Claydon Courtyard) – as well as other non-agricultural businesses set out in ES Volume 3, Figure 14.6a-b: Businesses within the community study area [EN010158/APP/6.3] [APP-073] are identified as 'high' sensitivity receptors, noting that operating practices may be affected with limited capacity to absorb or respond to change. This sensitivity is clearly influenced by the type of business, its operating model, and its reliance on accessibility and environmental quality – these receptors have been identified as 'high' sensitivity to be precautionary. Sensitivity is not influenced by the type of change, rather the operation of the receptor itself, and is therefore considered to be the same during both the construction and operational (including maintenance) phases. The magnitude of change for these non-agricultural receptors draws on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') and is determined by criteria set out in Table 14.22 of ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4], which considers whether there is:	The Council notes the clarification provided by the Applicant regarding the individual sensitivity applied to the receptor; however, maintains reservations about the level of impact magnitude assigned by the Applicant and, therefore, the overall level of significance of effect reported. The Council takes this opportunity to reinforce the request made at ISH3 and accepted by the Applicant to provide further granular analysis in the reporting that underpins the findings of the Population assessment, through a technical appendix. The Council would expect information set out here to be reflected in the description of relevant mitigation and design connected to the relevant receptor, in each case. This will need to clarify how the different impact types and magnitudes have been combined to reach a single conclusion, with mitigation and professional judgement set out for each individual business that together form the single receptor grouping reported on in the main body of the chapter. The Council will comment further, as appropriate, once the requested appendix is made available to the Examination.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	may arise for conclusions in the ES. 3. In the context of concerns raised by Preston Farms Limited and A.E.J. & F.J. Claridge, provide further justification for the minor magnitude of change and overall conclusions identified for agricultural businesses and landholdings during both construction and operation.	a) Loss, damage or change to attributes, quality or key characteristics or vulnerability (a <u>Moderate/Major</u> change would mean loss or severe damage e.g. direct total or partial acquisition and demolition compromising viability; a <u>Minor</u> change would be a discernible change in attributes, minor loss of or alteration to key characteristics – e.g. amendment to access or acquisition of land resulting in changes to operating conditions that do not compromise overall viability); and/or b) Introduction of severance with adequate accessibility provision (a <u>Moderate/Major</u> change would require the introduction of complete or severe severance with limited/moderate accessibility provision; a <u>Minor</u> change provides adequate accessibility provision). In all cases, in the context of these criteria, at most a minor magnitude of change is anticipated on all non-agricultural business receptors during the construction or operational (including maintenance) phases including TCS Biosciences Ltd, Hogshaw Farm and Wildlife Park, and Claydon House (and businesses within Claydon Courtyard) – along with others identified and set out in ES Volume 3, Figure 14.6a-b: Businesses within the community study area [EN010158/APP/6.3] [APP-073]. This is in consideration of embedded and additional mitigation in each case, including the provision of land swaps with equal or better provision of land in terms of quality and access, and additional mitigation has been developed through engagement with affected parties and in-line with standards and guidance for the management of (e.g. air quality, noise, traffic/access). Following the application of these mitigations, the Applicant believes that there would remain discernible change in attributes and a minor loss of some key characteristics of these businesses including amendment to access or acquisition of land (which, where acquired, would be replaced) resulting in changes to operating conditions that do not compromise overall viability. 2) Further justification for the Applicant's identification of a minor magnitude of change on TCS Biosciences during the construction phase and slight/negligible or minor during operation and overall conclusions; and any related potential implications for the NHS that may arise for conclusions in the ES. As the Applicant considers that effects on TCS Biosciences Ltd are mitigated through the provision of land swaps with equal or better provision of land in terms of quality and access, and additional mitigation has been developed through engagement with affected parties and in-line with standards and guidance for the management of (e.g. air quality, noise, traffic/access) adverse effects – and is designed to be flexible and responsive - the assessment concludes that although the business is of very high sensitivity, the magnitude of change would be minor resulting in a non-significant effect. The Applicant recognises that TCS Biosciences Ltd supplies the NHS. It is not clear the extent to which TCS Biosciences's Ltd viability is predicated on this supply chain relationship, but it is	

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		acknowledged that TCS Biosciences Ltd has a variety of other clients and a commercial business model that is not solely reliant on the NHS as a customer. In any case, the Applicant does not consider that there is a risk that: a) TCS Biosciences Ltd would be rendered unviable and therefore unable to continue to supply the NHS; or b) That the NHS would experience major effects on its operating model such that its diagnostics arm would be unviable – this is demonstrated through comments in the Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 [REP3-049] which refers to the Parliamentary Under-Secretary for Health and Social Care, Mr Zubir Ahmed's, comments in Parliament in which it was stated that "There are a number of suppliers on NHS Supply Chain's current framework which offer donor animal blood supply for diagnostic use which support a level of resilience across England." 3) In the context of concerns raised by Preston Farms Limited and A.E.J. & F.J. Claridge, provide further justification for the minor magnitude of change and overall conclusions identified for agricultural businesses and landholdings during both construction and operation. The Applicant has been mindful of concerns raised by both Preston Farms Ltd and A.E.J. & F.J. Claridge, who represent both agricultural and non-agricultural businesses within the Order Limits. These concerns relate to effects and mitigation relating to access, replacement land, environmental change and change in facilities and resources that may result in changes to the operation of these businesses. As set out above, the minor magnitude of change reflects that the Applicant considers – drawing on guidance (Design Manual for Roads and Bridges (DMRB) 'LA 112 Population and Human Health') that determines criteria set out in Table 14.22 of ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.4] – that following mitigation there is: a) a discernible change in attributes, minor loss of or alteration to key characteristics – e.g. amendment to access or acquisition of land resulting in changes to operating conditions that do not compromise overall viability; and b) Introduction of severance but with adequate accessibility provision through mitigation. A Moderate/Major change would require the introduction of complete or severe severance with limited/moderate accessibility provision; and loss or severe damage e.g. direct total or partial acquisition and demolition compromising viability. The Applicant has worked to understand and sought to develop bespoke mitigation for the effects identified by both parties – this has included very specific tailored measures set out within submissions to-date including: In relation to concerns raised by Preston Farms Ltd: The Applicant has previously provided information responding to concerns raised and addressing these through commitments to further bespoke mitigation measures as	

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
		described in Appendix 1 to Applicant's Response to Written Representations [EN010158/APP/8.12] [REP2-086]; - Further information is included in response to submissions from Preston Farms Ltd received at Deadline 3 within the Applicant's response to those concerns at Deadline 4 (Applicant's Response to Deadline 3 Submissions [EN010158/APP/8.22]). In relation to concerns raised by A.E.J. & F.J. Claridge: - The Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) [EN010158/APP/8.16] [REP3-049] refers to: a) The Applicant's commitments to liaison to address issues relating to minimise disruption at Knowlhill Farm within the Outline CEMP [EN010158/APP/7.2.5]; b) Emerging agreement on replacement land at Knowlhill Farm, subject to legal agreements being finalised; and c) Regarding the acquisition of rights in Plot 2/6, the confirmation that the Applicant has updated at Deadline 3 the Book of Reference [EN010158/APP/4.3.4] [REP3-008], Land Plans [EN010158/APP/2.2.4] [REP3-004], Works Plans [EN010158/APP/2.3.5] and Draft DCO [EN010158/APP/3.1.7] to reflect that it is no longer seeking rights over this plot, thereby removing Plot 2/6 from the Order land (but keeping it within the red line boundary). - The Applicant has amended and submitted an update to the Design Commitments [EN010158/APP/5.9.6] (design commitment G3) at Deadline 3 to protect access to the spring on which the farm relies for water.	

Table 2-14.1: Soils

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.15.3	Soil ecosystems The applicant's response to the Local Impact Report (LIR) [REP2-085] states that soil ecosystem services have not been assessed in Chapter 12 of the ES [REP2-031] as it pre-dates the updated Institute of Sustainability and Environmental Professionals guidance - A New Perspective on Land and Soil in Environmental Impact Assessment published in January 2026. The applicant has also updated Chapter 12 of the ES to clarify that soil structure is a more appropriate term for what is currently assessed in the ES. To the applicant and Buckinghamshire Council: - Should the Chapter 12 of the ES be updated to assess soil ecosystems in line with the updated guidance? If not, why not? To the applicant: - Notwithstanding the above question, whilst the applicant updated table 12.2 of the ES at deadline 2 to clarify that soil structure is a more appropriate term for what is assessed in the ES, the ExA and Buckinghamshire Council [REP3-053] note that the term soil ecosystems continues to be applied elsewhere in Chapter 12 of the ES. Undertake a review of the ES and update the terminology as appropriate.	The Applicant's response to the Local Impact Report (LIR) [REP2-085] contained a typographical error in referring to a different piece of guidance. ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] predates the ISEP (formerly IEMA) guidance 'Soil Health in Environmental Assessment', which was published in 2025. It does not predate the 2022 IEMA 'A New Perspective on Land and Soil in Environmental Impact Assessment' guidance, which has been used extensively throughout the chapter. As the ISEP 'Soil Health in Environmental Assessment' guidance was released post-submission, it would not be practical for the Applicant to add an additional soil health assessment at this stage. This would involve additional survey work which is not feasible within the remaining DCO examination timeline. Furthermore, the Applicant considers soil health through the provision of a soil health monitoring programme in the Outline SMP [EN010158/APP/7.7.3] [REP2-069], the methodology of which was agreed with Natural England. In line with the update made at Deadline 2 clarifying that 'soil structure' is a more appropriate term for the receptor given what is being assessed, ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] has been updated at Deadline 4 to refer to the receptor as 'soil structure', and not 'soil ecosystems', throughout for clarification.	The Council is satisfied that the Applicant has now correctly applied the IEMA guidance for the assessment of soil structure and referenced relevant chapters for the consideration of soil ecosystem services relating to cultural heritage, landscape and water.
Q2.15.6	oSMP - Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings Respond to Buckinghamshire Council's request [REP3-055] for the oSMP [REP2-069]	The Applicant acknowledges that, in accordance with the Institute of Quarrying (IoQ) guidance, clay and heavy clay loam soils have an inherently low resilience to structural damage when considered on the basis of textural class alone. However, the IoQ guidance also states that the resilience is significantly modified by the soil water regime (Soil Wetness Class) and the local climate. This is consistent	The Council agrees that the appropriate methods for soil handling are outlined in the outline SMP and that it is suitable for use but advises that the overestimation of soil resilience could lead to a lack of care in handling the soils.

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	to apply the principles on page 16 of the Institute of Quarrying Guidance Good Practice Guide for Handling Soils in Mineral Workings.	with the IEMA guidelines classifying the clay and heavy clay loam soils as medium resilience due to the field capacity days being fewer than 150. Furthermore, the Outline SMP [EN010158/APP/7.7.3] [REP2-069] explicitly recognises compaction as the principal risk associated with the Proposed Development and sets out a comprehensive framework of control measures. Soil handling suitability is therefore not overestimated in the Outline SMP [EN010158/APP/7.7.3] [REP2-069]. The assessment therefore already applies the principles of the IoQ guidance, as the classification of resilience as medium is in accordance with the IoQ assertion to take climate into account.	The Institute of Quarrying guidance specifies that factors beyond texture influence resilience to soil handling, such as the weakly developed structure and non-calcareous nature of the soils on this site. The outline plan will be developed into a detailed plan for construction, and the contractor may design construction methods based on a misunderstanding of the resilience of the soils to structural damage. In summary, the Council accepts the use of the outline SMP due to the appropriate soil handling measures described within it, but the Council disagrees with the downgrading of soil sensitivity, which undermines the importance of care required with these soils. This matter is agreed, but with concerns as detailed above.
Q2.15.9	Future baseline – climate change The applicant's response to the ExA's first written questions (ExQ1) Q1.18.6 acknowledges that ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [APP-105] notes increased winter precipitation, increase in magnitude and frequency of extreme rainfall events, and increased risk of drought as a likely climate change effect during the operational phase and that such changes may affect elements relating to soil resources such as moisture conditions. Clarify how such conditions have been taken into account in ES Chapter 12 [REP2-031].	Climate change projections, including changes in rainfall patterns and seasonal variability, have been considered in the embedded design and mitigation measures for the Proposed Development. In particular, the Outline Drainage Strategy [EN010158/APP/7.11.4] [REP3-040] incorporates the use of Sustainable Drainage Systems (SuDS) to manage surface water runoff across the Site. These measures reduce the risk of localised erosion during periods of increased rainfall intensity, therefore supporting the soil stability, and reduce the potential for erosion under future climatic conditions. In addition, the Proposed Development would maintain a grassland cover across the majority of the Site during operation. This provides protection of the soil surface, reduces susceptibility to erosion during heavy rainfall events, and supports soil moisture retention during drier periods as well as preventing erosion. The Applicant considers that the combination of drainage design, vegetation management, and soil protection measures provide an appropriate framework to protect soils against degradation processes during the operational phase, and ensure that soil function and agricultural use are not adversely affected over time in line with climate change projections.	The Council is satisfied with this response and notes that the Applicant has updated ES Volume 2, Chapter 12: Soil [REP4-034] to include a description of the impacts of climate change on soil under the proposed developed.
Q2.15.11	ES Chapter 12 – magnitude Provide further justification for the negligible magnitude of effect identified for the land take of 3.01 hectares of grade 2 agricultural land during the construction phase in the context of the criteria for magnitude specified in table 12.8 [REP2-031]. Buckinghamshire Council [REP3-053] and the ExA note that the description of magnitude in table 12.8	The assessment of impacts in ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.3] on ALC Grade 2 land has concluded that a negligible magnitude of impact is the correct classification. The criteria related to temporary developments provides that the magnitude of impact is minor if the impact is a temporary, reversible loss of soil-related features, or negligible if there is 'no discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use'.	The Applicant conducts a contradictory assessment of Grade 2 land compared with Grades 3a and 3b land. For Grades 2, 3a and 3b land, the Applicant states that there will be a temporary reduction in availability of agricultural land. However, they state that Grades 3a and 3b will experience a minor impact while Grade 2 land (very high sensitivity) will experience a negligible impact. Overall, 3.01 ha of Grade 2 land will be temporarily affected by construction, 2.4 ha of which will be under solar PV panels and 0.61 ha hosting ecological mitigation. This falls into the category of a minor impact according to IEMA guidance.

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	indicates that a “minor” magnitude of effect for grade 2 land would be more accurate. Such a change would also indicate a moderate or large effect according to table 12.9 which would be significant. Update ES Chapter 12 as appropriate.	The extent of ALC Grade 2 land is limited (3.01 ha), and there is no loss or reduction in soil function or soil volumes, as all Grade 2 land is either untouched, under a grass sward in the areas of Solar PV development, or hosting ecological mitigation/enhancement. Furthermore, the timing of construction works will be managed carefully to consider weather conditions, soils only will be worked and trafficked on when they are suitably dry and below the plastic limit. All construction activities are subject to committed mitigation in the Outline SMP [EN010158/APP/7.7.3] [REP2-069]. A negligible magnitude of impact on a very high sensitivity receptor results in a slight adverse and not significant effect.	In providing justification for assessing the impact on ALC Grade 2 land as negligible, the Applicant confuses their assessment of soil structure with ALC. They state that there will be no loss or reduction in soil on areas of ALC Grade 2 land. However, soil structure and volume are not the basis for assessing loss of land from agricultural production. It is the availability of agricultural land for agricultural production that is the basis and paragraph 12.5.17 states that areas used for key infrastructure such as solar PV panels will be unavailable for agricultural production for the operational lifetime of the project. The Council is therefore not satisfied that the Applicant has understood ALC adequately and feel that they have adopted an approach of “diluting” BMV impacts by downgrading any likely effects.

Table 2-15.1: Transport and Access

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
Q2.16.1	Staff parking during construction In relation to on-site staff parking during construction, the applicant's response to the Examining Authority's (ExA) first written question (ExQ1) Q1.19.6 [REP2-087] states that the “total number of parking spaces will be determined once the confirmed number of staff has been made (but will not exceed the assessed 600 employees stated in the assessment).” Should the outline Construction Traffic Management Plan (oCTMP) [REP2-065] make a clearer commitment to tie the number of spaces to the mode share? If not, why not?	At present the Applicant wishes to retain flexibility in the number of spaces provided to ensure that it accords with the mode share requirements and staff numbers. The mode share targets have been included in the Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.4] submitted at Deadline 4.	The Highway Authority is content that the mode share set out within the Outline CTMP are binding as a document of the DCO, affording certainty of a maximum number of spaces on the site, on the basis that not more than 600 employees will be on the site at any one time.
Q2.16.3	Construction traffic route Provide further justification for the proposed construction traffic route	Further details of the construction access strategy are provided in the Construction Access Review [EN010158/APP/8.26] submitted at Deadline 4.	The Highways Authority assessed the route which was provided to it. As noted, the Highways Authority has not assessed specific impacts on Preston Farms and TCS Biosciences. In such circumstances, and in the absence of an assessment of

ExQ2 Ref	Question	Applicant's Response	Buckinghamshire Council Comments
	having regard to any reasonable alternatives that were considered.		effects on those businesses but also a detailed route proposal, the Council cannot comment further at this stage.
Q2.16.4	oCTMP - mode share At issue specific hearing 1, the Council indicated [REP3-056] that it would explore the coverage of the mode share in the oCTMP [REP2-065] with the applicant further. Please provide an update on discussions and update the oCTMP if appropriate.	Following discussions with Buckinghamshire Council, the mode shares have been updated within the Outline CTMP [EN010158/APP/7.5.4] , submitted at Deadline 4.	The Outline CTMP commits the applicants to create a staff Travel Plan with measures to ensure that mode shares are met, the mode shares are defined and the Highway Authority retains control within the Highway Authority/Council to ensure that impacts are managed. Significantly the control of access to site through pre booking allows for inspection and monitoring of adherence to the Travel Plan to be submitted.
Q2.16.5	Junction modelling at the A41/ Station Road junction In its response to ExQ1 Q1.19.8 [REP2-087] stated that junction modelling for the A41 / Station Road junction would be provided at deadline 3. This information does not appear to have been forthcoming. Submit this information at deadline 4 and confirm the outcome of any discussions held with Buckinghamshire Council on this issue.	ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4.2] has been amended to include the junction modelling, and has been submitted at Deadline 4. The modelling indicates that sufficient spare junction capacity exists at the junction to accommodate the development traffic. This information has been provided to Buckinghamshire Council for their consideration. No adverse comments have been received to date on this matter.	The Highway Authority has reviewed the Linsig supplied and has agreed the terms of the modelling with the applicants and is satisfied that there is capacity at the junction to accommodate construction traffic.

