

Planning Act 2008 – section 55

Application by Rosefield Energyfarm Limited for an order granting development consent for the Rosefield

Solar Farm (EN010158)

Comments on Applicant's Deadline 5 Submissions

on behalf of the

Claydons Solar Action Group (CSAG)

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APPLICANT'S DOCUMENT/UPDATE	CSAG Comment
6.4.7 Environmental Statement Volume 4 Appendix 5.5 - Health and Wellbeing Summary Statement (REP5-065)	
7.7.21. <i>The magnitude of change is considered small for communities in Botolph Claydon, East Claydon and Granborough due to:</i> • <i>The small-scale exposure to effects;</i> • <i>The health effect is expected to relate to a medium term change on quality of life rather than a change in morbidity or mortality;</i> • <i>Very few residents being exposed to construction impacts on a regular basis;</i> • <i>No significant effects being reported, and a limited combination of nonsignificant effects; and</i> • <i>There being no service quality implications.</i> 7.7.22. <i>Based on these considerations, the significance of the effect of in combination / intra-project effects related to stress and anxiety linked with land use change, access change and multiple non-significant changes to environmental amenity combined with wider</i>	CSAG welcomes the intra-project assessment of impacts on health and wellbeing, but considers effects to have been understated. Had IEMA/ISEP Guidance been followed from the outset, the Environmental Statement would have addressed the now acknowledged significant cumulative health and wellbeing impact on some residents. The revised Health and Wellbeing Statement seeks to suggest that mitigations already proposed are adequate to address this significant impact. CSAG disagrees for the reasons set out in its submissions throughout the Examination. See for example Written Representation

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<i>changes in terms of community/social cohesion and general anxiety about the perceived effects of the Proposed Development as a determinant on health is considered to be minor adverse and not significant during the construction, decommissioning or operational (including maintenance) phases. 7.7.23. The magnitude of change is considered small to medium for Residential (including human) receptors located within 250m of the Order Limits due to:</i> <i>7.7.23. The magnitude of change is considered small to medium for Residential (including human) receptors located within 250m of the Order Limits due to:</i> <i>• The small-scale exposure to effects;</i> <i>• The health effect is expected to relate to a medium term change on quality of life rather than a change in morbidity or mortality;</i> <i>• Very few residents being exposed to construction impacts on a regular basis;</i> <i>• Limited significant effects being reported, which only relate to visual amenity, and a limited combination of non-significant effects; and</i> <i>• There being no service quality implications.</i> <i>7.7.24. Based on these considerations, the significance of the effect of incombination / intra-project effects related to stress and anxiety linked with land use change, access change and multiple non-significant changes to environmental amenity combined with wider changes in terms of community/social cohesion and general anxiety about the perceived effects of the Proposed Development as a determinant on health is considered to be minor to moderate adverse and potentially significant during the construction,</i>	REP1-127, REP5-108 in respect of public rights of way and REP2-102 in respect of landscape and visual-related Health and Wellbeing Impacts. CSAG's view is that the failure to appropriately assess intra-project impacts until this very late stage in the examination is further evidence of the Applicant's failure to follow the mitigation hierarchy. Such impacts should have been identified at the outset to enable consideration of whether they could have been avoided in their entirety or, if not, reduced. The conclusion that only a small number of residents will be adversely affected relies on false assumptions and understatement of many of the wide range of health and wellbeing impacts. For example, the reference to a medium-term health effect ignores the fact that the development will exist for the remainder of the lives of many residents and is a long-term change in the context of a human lifetime. The "small number" of residential receptors is not quantified, and the assessment undervalues the tranquility of the area, the high recreational value of public rights of way and lightly trafficked roads, as
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decommissioning or operational (including maintenance) phases, limited to a small number of residential receptors only.

well as open views across open countryside from both public viewpoints and private residences.

In addition, levels of stress and anxiety are already high due to the multiple, large scale, transformative developments, underway or proposed in the immediate area. While this is noted by the Applicant, it is unclear why this is relevant to only a small number of unidentified residential receptors.

As CSAG has set out elsewhere in its submissions, the range of impacts affecting health and wellbeing have been understated and insufficiently assessed. Where mitigation is offered, this is left over to the Detailed Design Stage meaning little or no assessment of the likely efficacy of mitigation has been carried out and there is little certainty that the proposed measures will be effective.

These include construction and operational noise impacts, construction traffic impacts on non-vehicular road users, noise and vibration impacts on users of public rights of way. In addition, the reliance on planting to screen the development would result in adverse impacts of its own through loss of currently open views, which has not been adequately assessed or acknowledged.

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	The assessment of cumulative impacts with other major development in the area remains inadequate and understates the impact on local residents, who have already suffered years of heavy traffic, disruption and road closures.
Applicant's Response to Action Point 1 from ISH3 Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) (REP5-090)	
ACTION POINT 1 was: Clarify position on overplanting including when the development becomes operational. The applicant is to include in its response: • a response to Claydon Solar Action Group's D4 representation [REP4- 103] and the figures provided at table 2 of that submission • the panel ratings and assumptions the applicant has used in its baseline and overplanting calculations, and the context of the overplanting ratio in policy • a review of recent case law <i>Ross v Secretary of State for Housing, Communities and Local Government</i> [2025] EWHC 1183 (Admin) and <i>R (on the application of Ian Galloway) v</i>	<u>Response to CSAG 's D4 Representation on overplanting</u> Having maintained throughout the Examination that the proposal is for a 335MW scheme and having assessed the application on this basis, the Applicant is now indicating that the export capacity of the site may in fact be 500MW. In the Grid Connection Statement (APP-137), the Applicant advised that NESO's decision on the reduced connection was expected in Q1 of 2026. The Applicant now says NESO's decision is expected in Q1 2027 – after the DCO is due to have been determined.

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Durham County Council v Lightsource SPV 215 Limited [2024] EWHC 367 (admin). APPLICANT'S RESPONSE <u>Overplanting</u> This part of the response is provided in the Applicant's Response to Deadline 4 submissions (REP5-089). Assuming no changes to the indicative design, ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2.2] [APP-051] provides that the nameplate capacity of the Proposed Development at the time of DCO Application is 334.1MW. • When assessed against a 500MW grid connection, it is clear that the Proposed Development is not overplanted. • When assessed against the revised 335MW grid connection, the overplanting ratio would be much closer to 1, but still less than 1, therefore also not overplanted. (334.1/335=0.997)...	The Applicant has never provided evidence of the request to NESO nor any response to/acknowledgement of the request. CSAG notes that the Applicant does not dispute the overplanting figures provided in the Deadline 4 submission. As noted below, in the light of the information about panel capacity provided by the Applicant, the overplanting potential of the site is likely to be much greater than CSAG's assessments indicated. This is assuming 335MW export capacity, rather than the currently agreed 500MW export capacity. <u>Panel Ratings and Assumptions</u> CSAG does not consider the Applicant's response accords with EN-3. EN-3 paragraphs 2.10.70 and 2.10.71 indicate the level of information required as follows:
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The levels of overplanting calculated in this representation (23% to 45%), if achievable at the Proposed Development while still respecting the Design Commitments, are commercially and operationally rational; and

Overplanting to this level would increase utilisation of the grid connection secured for the Proposed Development and the benefits deriving that use.

Panel Ratings and Assumptions

The Applicant used an indicative panel rating of 710Wp run of modules in the PV yield analysis programme to calculate the 334.1MW value for its baseline and overplanting calculations, which was used as the basis of capacity in the Environmental Statement (ES). This is an indicative figure based on the design of the Proposed Development at the time of the DCO Application. The design of the Proposed

2.10.70 In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include:

- *the type, number and dimensions of the panels*
- *Layout and spacing*
- *The type of inverter or transformer*
- *Whether storage will be installed (with the option to install further panels as a substitute*

2.10.71 Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.

The Applicant has now provided information about the capacity of panels used in the original design of the scheme, but no information about the number or dimensions of the panels or layout or any other infrastructure or any options under consideration.

The response now advises that the design of the scheme was based on panels of 710W – now overtaken by the widespread availability of panels of 750W and greater capacity. From this information it can be calculated that there will be some 471,830 panels across the site.

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Development is still being refined throughout the Examination process and the final choice of panels will be appropriate for the final layout of the Proposed Development ROSS V SSCHLG <i>“The Ross case is particularly relevant. The court states that the correct interpretation of NPS EN-3 is that overplanting can be used to address solar panel degradation, and for alternative reasons consistent with the policy. The case additionally provides that ‘Overplanting for the purposes of site maximisation and of addressing the consequences of the STC rrating [how the output of solar panels is tested in laboratory conditions] is clearly consistent with the objective of maximizing the generation of renewable energy’ and that paragraph 4.2.21 of EN-1 requires “each location to maximise its capacity”</i>	If 750W panels were used instead of 710W panels, total site capacity could be in excess of 353MW before accounting for the anticipated increase in panel capacity by the time the scheme is implemented. Given the reliance of the scheme on the delayed redevelopment of the new East Claydon substation, the construction of Rosefield is unlikely to be commenced until after 2030 if consent is given. The National Grid had intended to submit a planning application for the new substation last year with development due to commence in 2028. NG has not yet even commenced consultations on the proposed redevelopment, meaning the works are unlikely to take place until the 2030s. Consequently, the Rosefield scheme when developed is likely to entail a very significant level of overplanting, contrary to the Applicant’s assertions that no overplanting is proposed.
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“The Ross case also provides clarity on the amount of overplanting that is acceptable in a project. The court provided its interpretation of footnote 92 of NPS EN-3, specifically, that footnote 92 does “not impose a separate requirement that the extent of the overplanting has to be reasonable” and stated that this is not necessary to address the planning balance.”

If the Applicant is unable to secure a connection for the proposed BESS, this will enable additional overplanting because the fields intended for BESS would become available for solar arrays.

ROSS V SSCHLG

CSAG has not sought to suggest that overplanting is not supported by EN-3, but pointed out that where overplanting is proposed, the development should be assessed in knowledge of the extent of the overplanting and that the Applicant should demonstrate that the overplanting is justified.

The Applicant’s statement that: *“The court provided its interpretation of footnote 92 of NPS EN-3, specifically, that footnote 92 does “not impose a separate requirement that the extent of the overplanting has to be reasonable” and stated that this is not necessary to address the planning balance”* is a misinterpretation of the judgement.

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	In the comment relied on by the Applicant, Mr Justice Eyre was responding to submissions by the Claimant that <i>“that the Inspector should have regarded the reasonableness or otherwise of the degree of overplanting as a requirement which had to be satisfied and which was separate and distinct from the overall assessment of the planning balance”</i> and that <i>“determination of this issue was distinct from and logically prior to consideration of the planning merits.”</i> (at 62) Contrary to the Applicant’s assertions, Eyre J. confirmed that the decision-maker is required to address the reasonableness of any overplanting as part of the planning balance. His point was merely that the matter did not have to be treated as prior to or separate from the planning merits of the scheme. Eyre J. found that the Inspector in the Ross case had indeed assessed the reasonableness of the proposed level of overplanting: <i>“he approached the question of the interpretation of EN-3 in the correct manner. He looked at EN-3 as a whole with particular regard to its</i>
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	<i>purpose and considered the nature, effect, and purpose of overplanting.” (at 75)</i> He noted “...<i>the Inspector had taken considerable care to explore the extent of the overplanting and to probe the justification for it.</i>” (at 98) This included seeking information about the number, design and capacity of the proposed panels and the reasons why overplanting was appropriate or necessary. In this case, the Applicant has not provided the Examining Authority with any such information to enable it to reach a judgement on the matter. Given that the Applicant’s position has been that it does not intend – or presumably require – any overplanting, in CSAG’s view, more could be done to avoid the adverse impacts of the scheme.
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	As CSAG has stated throughout the examination The Applicant could substantially mollify or even negate many or most of the ecology concerns by means of significant changes to its scheme, including removal of PV arrays from Fields B2-B11, B18-B20 and D28 and D29. Removal of these fields would also reduce landscape and visual impacts and impacts on the settings of heritage assets. At the very least, the Applicant could remove panels from the entirety of field B7 to benefit Bechstein's bats and exclude field E23 from development to address the concerns raised by TCS biosciences/Preston Farms. This is all the more the case, given the strong possibility that the fields proposed for the BESS will become available for solar arrays. It is now clear that, due to rapidly improving solar technology the Applicant could remove solar arrays from a very large proportion of the site and still comfortably deliver 335MW to the grid by the time the scheme is implemented.
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Applicant's Response to Action Point 2 from ISH3 Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) (REP5-090)	
<i>Action Point 2:</i> Identify decisions where the Secretary of State has considered the need for BESS as aligned with the need case for solar <u>Applicant's Response:</u> <i>The Applicant would note that every DCO that has been consented which includes storage has considered the need for BESS as aligned with the needs case for solar. Some recent examples include: Springwell Solar Farm (EN010149), One Earth Solar Farm (EN010159), Peartree Hill Solar Farm (EN010157) and Tilbridge Solar Project (EN010142</i>	While other DCOs have deemed BESS to be aligned with the needs case for solar, none that CSAG is aware of have addressed circumstances equivalent to the current case in which the Applicant has not secured a connection agreement for the BESS and there is ample battery energy storage provision immediately adjacent to the site. In the Tillbridge Solar Project (EN010142) the Applicant provided detailed information about the BESS at an early stage of the Examination (ISH1). This included (inter-alia) the following: <i>"The direct relationship between the BESS and the principal development is emphasised by the DC coupling approach, which requires the BESS to be distributed across the principal site and co-located with the solar PV arrays and solar stations.</i> <i>The BESS is subordinate as evidenced by its dispersion throughout the indicative principal site on the indicative layout plan, in comparison to other developments where BESS is typically in a single location."</i>

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	In the Peartree Hill case (EN010157), the ExA did not address the question of whether the BESS was associated development in any detail, merely asserting that the BESS “<i>would fall within the scope of NPS EN-5</i>”. CSAG would question this approach, because footnote 4 of EN-5 (2024) specifically directs the decision-maker to the relevant technology specific NPS. Paragraph 2.10.16 of EN-3 indicates associated <i>development “such as energy storage”</i> should be treated on a case-by-case basis. The question of associated development does not appear to have been addressed at all in the Springwell Solar Farm (EN010149) or One Earth Solar Farm (EN010159) cases. In all the cases cited, the Applicant is said to have secured a grid connection for the whole development, not the solar alone.
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Applicant's Response to Deadline 4 Submissions [EN010158/APP/8.32] [REP5-089]	
3.9 (Responding to Bucks Council's comment that Applicant should identify and secure sufficient compensation land and land management actions to compensate for the displacement of 39 breeding pairs of skylark, the Applicant references its Position Paper on Ground Nesting Birds and Wintering Birds [EN010158/APP/8.36] [REP5-093].	Please see Bioscan Deadline 6 submission responding to the Position Paper. CSAG remains unconvinced that the compensatory provision for skylark is adequate to prevent net negative effects.
3.12 (Responding to the release of the proposed Bernwood SSSI boundary, suggesting that any potential impacts on the proposed features to be included within the proposed Bernwood SSSI are considered capable of being effectively mitigated through the implementation of the measures secured in the Outline LEMP [EN010158/APP/7.6.6]).	CSAG maintains its concern that the applicant's efforts and approach to protecting, buffering, avoiding indirect impact to and assessing the proposed SSSI are not consistent with what would have been expected if the designation was already in place. The applicant's belated removal of PV panels from the entirety of Field B6 and Field B8, western and southern parts of Field B7 and the increase in buffer to Sheephouse Wood and Shrubs Wood all stand as evidence that this has been the applicant's approach, and CSAG are concerned that even

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	with these concessions, the scheme remains a threat to the integrity of any future Bernwood SSSI.
3.14 (Responding to CSAGs concerns around the accuracy of the BNG assessment, suggesting that the Applicant is confident that the BNG assessment undertaken is accurate and provides a true reflection of the baseline habitats and conditions currently present within the Order Limits and that the habitat creation and enhancement proposals are pragmatic and deliverable on the ground. Reference is made to the applicant's Position Paper on Arable Field Margins and BNG Assessment [EN010158/APP/8.37] [REP5-094] and to the applicant's revised BNG Assessment [REP5-058]).	Please see Bioscan Deadline 6 submission responding to the Position Paper, revised BNG assessment and accompanying Metric Calculation. This provides evidence that the calculation is still inaccurate and unreliable for decision making and that the Applicant's ability to fulfil its commitment to delivering a minimum of 40% area habitat units as part of the Proposed Development remains in question.
3.15 (Responding to CSAGs ongoing concern about measuring buffers from hedgerow centreline, stating that the Applicant considers this is the most consistent and accurate way to measure buffers (as well as being realistic/achievable on-site), the above approach has been deemed sufficient for the consented Byers Gill and Springwell NSIP solar DCOs).	CSAG notes that the Applicant's approach is still rejected not just by CSAG but also by NE and Buckinghamshire Council, and that the Applicant failed to respond to CSAG's specific point which was about the ease with which a more logical and ecologically effective approach could be adopted. The Applicant's citing of DCO schemes where their approach has been taken is a) made without any supporting evidence that these schemes related to rare Annex II bat species as at Rosefield;

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	b) without evidence that this matter was closely interrogated in the course of those examinations and c) made in disregard to the fact that at a comparable nearby solar DCO scheme (Botley West), which affects Annex II bat species, the more logical and defensible approach to buffer measurement has been taken. Please also see Bioscan's submission on behalf of CSAG at Deadline 6 responding to the removal of panels from certain B-fields and other design changes, and which emphasises the importance of effective buffers in the context of the uncertainty around the range of displacement effects on bats from solar arrays. This point has also been made by Natural England in their Deadline 5 submission.
Applicant's Response to Action Point 45 from ISH1 – Revision 02 – July 2026	
3.2.1. While the above assumes that livestock have similar tolerances to HF as humans, concerns have been raised that the AEGLS cannot be applied to livestock within the Preston's Farm holdings... 3.2.3. As AEGL1 limits are designed to ensure reversible or prevent more minor	CSAG's BESS safety Expert Professor Dobson notes: There are many other compounds and substances emitted, especially metal-containing particulates and these have not been defined or modelled.

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effects in the most sensitive human populations, they are judged most applicable for comparison against animals... in the absence of evidence on the levels that would harm the specific horses to the level that would have an effect on the business, it is not possible to conduct a further assessment beyond the comparison with the strictest human standards and available animal NOAELs	CSAG further notes that where there is insufficient scientific evidence to enable assessment, a precautionary approach should be taken. The Mitigation Hierarchy dictates that the precautionary approach would be to avoid any risk to the livestock at TCS/Preston Farms.
3.4.1 The study of the effects of BESS fires is an emerging field, but emission data captured in real-world BESS fires have demonstrated that environmental impacts did not have significant off-site impacts.	Professor Dobson notes that this not correct. Particulates were identified and well documented at distance from the Moss Landing fire. (See REP2-103 and REP5-109)
3.4.1 While it is acknowledged that BESS fires represent a source of environmental pollution, this is the case for other types of accidental fires. Data captured in real-world BESS fires have demonstrated that environmental impacts did not have significant off-site impacts. there is evidence that the risks are broadly similar to other fires, as highlighted in a recent paper produced by the National Fire Protection Association	In fact, the research cited highlights the lack of evidence related to BESS fires and their pollution risks. It says: <i>“While emission factors strongly influence environmental impact, they are not the only parameter. Indeed, the dispersion of the plume is also a critical factor. A particularity of LIB fires highlighted in this study is the limited dilution of the fire plume due to the kinetics involved, which affects the indirect contamination of soil and water. <u>Finally, more extensive analyses of contamination in real cases and large-scale</u></i>

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testing are recommended to broaden and gather more consistent data for future environmental impact assessments of LIB fires.” (Our emphasis.)

The Research Report concludes:

“To improve the current knowledge of emission factors, specific precautions should be introduced for LIB tests, including continuous measurement of emissions while considering as many gases and substances as possible. Furthermore, a specific focus on mass loss rate is needed for those tests, as emission factor estimation is impossible without this value. In addition, one should highlight the lack of data regarding contamination by PFAS during LIB fires.

Finally, to provide a relevant evaluation of the environmental impact of such fires, water contamination should be analyzed using various application methods and different cell characteristics. Such water contamination knowledge improvement is a key to developing firefighting strategies keeping in mind that using large quantities of water or letting the fire burn could be valid approaches. The best

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	<i>strategies depend on many local parameters and the equilibrium between air and water contamination.</i> <i>It is recommended that research programs intending to contribute emission factor information for battery fires report the following information at a minimum:</i> <i>• The total energy (in kWh) and mass of the LIBs studied</i> <i>• The final mass of any residual materials after destructive battery testing</i> <i>• An assessment of potential contaminants, including PAH, VOC, and particulates</i> <i>For a more comprehensive analysis, a complete study could include:</i> <i>• A full quantitative evaluation of potential contaminants</i> <i>• Quantification of particulate release</i> <i>• Measurement of potential contamination to extinguishing water</i> <i>Finally, an important factor when considering the available data concerning lithium-ion battery emissions is that the majority come</i>
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	<i>from small-scale tests performed at the cell level. Obviously, transposing those measurements to real situations is highly challenging and should be considered with care. Developing large-scale tests that include the fire emissions should be considered for future evaluation of the environmental impact of such fires.</i> (Appendix 1) The Research entirely contradicts the Applicant's claim that the risks of fire/thermal runaway are both known and exceedingly remote. It confirms that there is a lack of empirical evidence about the environmental impacts of such events, highlighting the need for a precautionary approach. We attach the research as Appendix 1.
3.4.8. At this stage the Applicant will work with Preston Farms and TCS Biosciences to also establish where their workers of Preston Farms are likely to be situated so these receptors can be analysed for a potential thermal runaway event to provide further reassurance to TCS Biosciences that the risk remains low for their workers and livestock i.e. there is no credible requirement for evacuation of workers or animals. A recent report reviewing 35 large-scale BESS	As CSAG noted at ISH3, the report relied on was extremely limited in scope and is contradicted by National Fire Protection Association research cited above. The report was commissioned by American Clean Power, a lobby group for the US renewable energy industry.

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fire incidents and associated environmental monitoring data “Assessment of Potential Impacts of Fires at BESS Facilities” (Fire & Risk Alliance and American Clean Power, 2025)	
1) CSAG Landscape Comments on Applicant’s Deadline 5 Submissions Note that the relevant landscape-related material in the Applicant’s Deadline 5 submissions has been reviewed, including the revised LVIA, but only items where CSAG has comments to make are included here. Where no comments are provided, CSAG’s position remains as set out in its previous submissions, and the absence of comment should not be taken as agreement with the Applicant’s response.	
REP5-089] Applicant's Response to Deadline 4 Submissions Ref 3.25: identifier CSAG ref [REP4-103] pp 14 – 15, re non-visual effects.	Ms Tinkler’s opinion is that the Applicant’s assessment of non-visual effects is too narrow. The Applicant’s response has not changed this opinion: there is still no consideration of many of the highly important and relevant intangible factors shown on <i>Figure 1: What is Landscape?</i> (Natural England <i>An Approach to Landscape Character</i>

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	Assessment 2016), nor of landscape and visual functions, which – contrary to the Applicant’s assertion – would certainly continue to be experienced on cessation of construction activity.
Ref 3.26: identifier CSAG ref [REP4-103] p 16 re loss of view / disruption of field patterns.	<u>Loss of view</u> Ms Tinkler does not dispute that the LVIA considers the effects of the loss of the view, but does not agree with the Applicant’s approach, as set out in the response, which is <i>‘that the screening of solar PV development itself warrants some reduction in magnitude of effect’</i>. As explained in [REP4-103], in LVIA, in many cases the loss of existing view will result in a high level of adverse magnitude of effect, or change, therefore the overall level of effect would remain Major / Moderate Adverse. <u>Disruption of field patterns</u> The Applicant’s response does not address Ms Tinkler’s point because it only considers changes to existing hedgerows, not the introduction of new ones (for mitigation purposes) along lines where historically, hedges did not exist. The new hedges would be

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	uncharacteristic and inappropriate, giving rise to adverse landscape and visual effects. Examples of where long sections of new hedges would be introduced are along the public bridleway and footpath (the latter being part of the Bernwood Jubilee Way) south of Botolph Claydon leading to Runt's Wood (these hedges may also result in total loss of view at certain locations).
[REP5-047] Cumulative Visualisations (Rev 2) These plans show visualisations of '<i>further existing and/or approved developments</i>'.	The visualisations are based on 3D 'wirelines' (or 'wireframes'), which even experienced landscape practitioners and other professionals find difficult to interpret, as they only show a 'flat' representation of the geographical extent of land covered by development, with no indication of the scale and volume of built form and other Scheme elements. Here, the background photography used in the visualisations is in black and white and is pixellated, so it is very difficult to identify existing structures and features in the landscape, and renders even prominent existing structures as unobtrusive.

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	It would have been more helpful if a plan showing the locations of the viewpoints had been provided at the front of the document, and the key to the colours used for the different developments had been provided on each page, The Landscape Institute's guidance <i>Visual Representation of Development Proposals</i> (Technical Guidance Note 06/19) sets out four categories of visualisation, and explains which are most suitable for the purpose of the exercise in question. It advises that the Type 2 wirelines provided by the Applicant may be used as '<i>Evidence submitted to Public Inquiry</i>' and '<i>Visualisations in public domain</i>' (Table 1), but they are not considered suitable for '<i>the most demanding and sensitive of contexts</i>', which – given the nature and scale of the proposed development and its adverse effects – should apply here. Type 3 visualisations are not considered suitable for this purpose either: only Type 4 visualisations provide the level of information considered necessary for such contexts. However, in Ms Tinkler's opinion, Type 3 could suffice in this instance.
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	In summary, the parties have already agreed that the Scheme would result in significant adverse cumulative effects, on landscape character, public and private visual amenity, and recreational amenity, but the levels of the cumulative effects are not agreed .
[REP5-062] <i>Landscape and Visual Inter-project Cumulative Effect Assessment</i> (Rev 4) (Tracked) concludes that none of the additional cumulative developments ‘ <i>would result in any changes to the existing assessment of effects due to their separation distances from Rosefield Solar Farm... and/or relatively small scale</i> ’.	Ms Tinkler does not agree that there would be no change. Based on what can be ascertained from the new wirelines, levels of adverse cumulative landscape and visual effects would increase by a certain degree, given the increase in the number of developments which would be visible in the same view. Therefore, levels of adverse cumulative effects would be higher than currently predicted.
[REP5-046] ES Appendix 5.4 <i>Glint and Glare</i> (Rev 2) (Tracked)	The only revision to this document is the inclusion of the guidance used for the Applicant’s glint and glare study, which is in response to Action Point 21 from ISH3. Glint and glare matters are dealt with in CSAG’s <i>Landscape Closing Summary Statement</i> for Deadline 6.

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[REP5-098] <i>Applicants Response to Action Point 22 and 23 from ISH3</i> This purpose of this document is to <i>'provide further glint and glare assessment of the local roads in the study area with an accompanying sensitivity test, and to comment on the assessment of Preston Farm/TCS Biosciences provided within ES Volume 4, Appendix 5.4: Glint and Glare Assessment [EN010158/APP/6.4.2]'</i>.	In Ms Tinkler's opinion, the findings and conclusions of this study cannot be relied upon, for reasons which are explained in CSAG's <i>Landscape Closing Summary Statement</i> for Deadline 6, under the heading <i>Glint and Glare</i>.
<u>CSAG Landscape Comments on Other Parties' Deadline 5 Submissions</u> Note that the relevant landscape-related material in other parties' Deadline 5 submissions has been reviewed, but only items where CSAG has comments to make are included here. Where no comments are provided, CSAG's position remains as set out in its previous submissions, and the absence of comment should not be taken as agreement with other parties' positions.	
Buckinghamshire Council Comments and Notes	

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[REP5-100] Comments on the Applicant's Response to Deadline 3 Submissions Ref 3.1.14 p14, [Ex]Q1.11.30, re cumulative effects assessment and method	CSAG shares the Council's concerns, which '<i>extend to the Applicant's exercise of professional judgement in assessing the magnitude and significance of cumulative effects, and also the Applicant's underlying assessment of environmental effects across the DCO (as an underestimation of the environmental effects of the Proposed Development is likely also to underestimate the cumulative effects of the Development)</i>'.
Ref 3.1.34 p26, Q1.15.10, re BESS effects / mitigation	CSAG agrees with the Council's opinion that '<i>the anticipated impacts of the BESS and its associated structures are insufficiently avoided and mitigated</i>'.
Ref 3.3.21 p21, Table Ref. Q1.10.6, re screening vegetation	Ms Tinkler notes the Applicant's proposal to plant woodland to screen views from listed buildings, and the Applicant's comment that '<i>Without this screening there would be harm to listed buildings on the south side of Orchard Way</i>'. However, as mentioned in CSAG's <i>Landscape and Visual Report</i> (LVR) [REP1-127], it is very important to bear in mind that harm to settings

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	arises from non-visual as well as visual effects. See Historic England's publication <i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3</i> (Second Edition), page 2, 5 th para. of Part 1: <i>Settings and Views</i> .
Ref 3.4.33 p44, Ref 4.1 re effects on Claydon House	CSAG shares the Council's concern that there has been a focus on ' <i>views and screening rather than the wider relationships with associated assets and approaches</i> ' – see reference to Historic England's publication <i>The Setting of Heritage Assets</i> above.
[REP5-102] <i>Comments on the Applicant's Response to ExQ2</i> Ref Q2.1.2 re NPS EN-3 - glint and glare REP5-089 - 3.40 Response to Buckinghamshire Council [REP4-092], Pages 4 and 5 and Buckinghamshire Council [REP4-094], Page 3 REP5-046 – attachment of Pager Power guidance	Throughout the Examination, Ms Tinkler has expressed significant concerns about the Applicant's glint and glare assessment (GGA). So far, the concerns have neither been adequately addressed, nor resolved. The Applicant's GGA concludes that no significant adverse effects would arise from glint and glare; however, the findings are based on the informal method produced by Pager Power, a company which dominates the sector.

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	In Ms Tinkler's opinion, the method is highly flawed, masking a real risk of serious injury or even fatality resulting from glint and glare. As explained in CSAG's previous submissions, this has subsequently been confirmed by a leading industry expert appointed to advise on another scheme (the Lime Down solar NSIP Examination (EN010168]), by a group of residents (Stop Lime Down (SLD)). With reference to landscape and visual effects, regardless of whether or not the effects would be 'significant' adverse, the LVIA should still have considered the effects of glint and glare in particular locations / for specific landscape and visual receptors. The overall effects of glint and glare are very likely to adversely affect people's experiences of being within / travelling through these landscapes. In particular, the effects can range from being potentially dangerous at close quarters, to disturbing / unpleasant nearby, and distracting at longer distances. Furthermore, glint and glare effects exacerbate the industrialising effects of the installation.
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	Regarding the method and the safety implications, Ms Tinkler respectfully asks the ExA to carefully consider the industry expert's opinions and concerns about the GGA method. These are currently the subject of discussion at the Lime Down solar NSIP Examination (EN010168). A succinct analysis of the issues can be found in Section 3.5 of SLD's Deadline 4 submission [REP4-132]. In summary, SLD's Deadline 4 submission explains that having reviewed the material, and attended meetings with the Applicant's glint and glare consultants (Pager Power) to discuss technical matters, the expert concluded as follows: <i>'... the Pager Power report and modelling outputs lack sufficient data and robust evidence specifically around quantitative thresholds, hazard and risk analysis, sufficient evidence demonstrating impact as a result of cumulative and multi-directional impact of solar reflections. The fact that this study was undertaken using Pager Power developed software that has not been independently validated brings into question the validity of the results together with the interpretation of these results. The Pager Power guidance is</i>
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	<i>essentially their own internal guidance made available to others as requested. Given the safety-critical nature of this issue, such guidance needs to be independently assessed against industry-recognised criteria'.</i> The expert also asks Pager Power to respond to several technical questions. Responses and further submissions made by the SLD group's expert were submitted at Lime Down Deadline 5 on the 7th of August, which should be published at around the same time as Rosefield Deadline 6, so can be referred to for further information / made available if required. Of relevance will be SLD's Deadline 5 responses report <i>Appendix B Glint and Glare Responses to ExQ2 And Independent Review Of Pager Power Guidance.</i> Another point to note about glint and glare is that the effects can be exacerbated by panels which are standing in water. Note that the Rosefield Applicant proposes 4.5m high panels within the flood plain. This needs to be factored into the Applicant's GGA.
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Ref Q2.12.2 Moderate (not significant) effects	CSAG shares the Council's concerns about levels of landscape and visual effects having been underestimated, the reasons for which are <i>'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'</i>. The Council mentions the problems associated with the use of a three-point scale, which Ms Tinkler has highlighted in CSAG's responses.
Ref Q2.12.3 Assessment of effects	Reiteration of problems associated with LVIA method including point scales: Ms Tinkler agrees.