



AtkinsRéalis



Rosefield Solar Farm (EN010158)

Buckinghamshire Council's Final Principal Areas of Disagreement Summary Statement

Buckinghamshire Council

August 2026

Introduction

This document provides the final updated summary of the principal areas of disagreement between Buckinghamshire Council and the Applicant at Deadline 6, based on the submitted Environmental Statement, subsequent clarifications, the Council's Local Impact Report, and submissions of the parties. It sets out the key issues where significant concerns remain, the reasons why the Council considers the Applicant's assessment or mitigation to be inadequate, and the remedy measures that would be required to address those concerns.

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
Site Selection	Site selection process appears to have been driven primarily by single landowner availability, not by a constraints-led or environmentally proportionate assessment. Lack of evidence that other land parcels within the 10km search area were identified, evaluated or discounted on environmental, landscape or planning grounds. No clear demonstration that the Applicant considered alternative locations for the BESS, including less visually sensitive parcels. Insufficient assessment of the undulating landform, which intensifies visual prominence from PRowS and settlements. Failure to consider whether flatter or more enclosed areas both within and outside the landholding could reduce landscape, heritage or ecological harm. Incomplete exploration of opportunities to co-locate the BESS with existing or consented energy infrastructure, including the National Grid substation and consented BESS sites.	Provide an alternatives assessment, demonstrating a constraints-led approach to site selection across the full 10km search area. Reassess all available land parcels (inside and outside the willing landowner area) against ecological, landscape, heritage and PRow sensitivity. Consider alternatives to the provision of BESS as part of the Scheme, or take steps to modify the BESS proposed and its location so that it is less visually elevated and that the harms caused by it are better contained. Demonstrate that the chosen layout represents the least-harm option within the Order Limits, evidenced through sequential design testing. Provide an options appraisal for co-location with existing or consented infrastructure, especially the National Grid substation and adjacent consented BESS. Include detailed topographical and ZTV-led analysis showing how alternative siting could reduce visual harm. Revisit design to avoid siting infrastructure in parcels within the highest ecological sensitivity,	Low

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	Insufficient justification for selecting fields D8/D9 for the BESS despite elevated, visually exposed, and heritage-sensitive context. No transparent assessment showing whether alternative layouts within the Order Limits could avoid highest-sensitivity landscape, ecological and heritage receptors. Issues related to removal of panels from PV for ecological and landscape reasons are addressed in the appropriate section below.	including areas forming critical habitat connectivity. Supply full justification for why alternative land parcels could not be used, aligned with EN-1 and EN-3 requirements for proportional alternatives assessment.	
Ecology	High risk of significant harm to a genetically vulnerable and isolated Bechstein's population within the Core Sustenance Zone of Finemere Wood. Solar infrastructure still proposed in key foraging and commuting fields (B7, B10, B11, D28, and D29), contrary to advice from the BBOWT and the Council's position. Proposed buffers below VALP NE8: insufficient setbacks from ancient woodland, other woodland, and hedgerows. Loss of approx. 2,060m of hedgerow, including 1,310m permanent, leading to fragmentation of ecological networks in the	Remove solar infrastructure (arrays, cabling, compounds) from key bat foraging/ commuting fields: B7, B10, B11, D28, and D29. Increase all ecological buffers to comply with VALP NE8: • 50m to ancient woodland • 25m to other woodland • 10m <i>each side</i> of all hedgerows As measured from the edge of the existing feature. Redesign layout to maintain continuous, dark, uninterrupted ecological corridors between Sheephouse Wood, Shrubs Wood, Finemere Wood and Runt's Wood using suitable buffers	Low

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	Bernwood Opportunity Area. Compensation land for ground-nesting birds and over wintering birds have been identified. This is proposed to be multi-functional providing foraging and commuting resources for bats and birds. For this to work robust management and monitoring including remedial measures will need to be provided The Applicant is stating the scheme will have significant beneficial effects on farmland birds at a local level. Three species of farmland birds, Lapwing, Golden Plover and Skylark, are being impacted and their status post development is entirely dependent on the enhanced grassland being proposed. The outline bat monitoring strategy is lacking necessary detail regarding the method for establishing a baseline and agreement between the applicant and HS2 in relation to ongoing monitoring of how bats are using the landscape. Details of the remedial actions are required, including the option to enlarge buffers via the removal of panels.	to retain existing connections. For the areas of enhanced grassland to provide sufficient habitat for the variety of species identified, detailed management prescriptions along with robust monitoring will need to be established in the LEMP. There will be a need to include remedial measures to address consistent declines of identified species to ensure the validity of this monitoring. Acknowledgement that the three species of farmland birds identified in the Applicants supplementary report may not benefit significantly from the scheme as it is entirely dependent on the success of the multi functional grassland being proposed Provide a detailed monitoring strategy, covering bats, ground-nesting birds, and wider farmland bird assemblages. The strategy needs to clearly set out what remedial measures will be undertaken if populations are found to be impacted. Avoid artificial lighting in all sensitive parcels and secure a strict dark-sky strategy. Removal of HS2 mitigation planting to accommodate the scheme to the west of Parcel 1, reducing the area of woodland planting, reducing the ancient woodland buffer	

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	Cumulative effects with HS2, East West Rail, solar/BESS schemes under-assessed, despite overlapping ecological constraints.	and reducing the bat corridor in the area around Decoypond Wood. The loss of woodland has not been accounted for within the biodiversity net gain calculations. Whilst there is a SoCG between HS2 Ltd and Rosefield Solar Farm, the Council remains concerned that this has been negotiated between parties without a formal change to the HS2 Schedule. This matter requires investigating further and may result in enforcement action against HS2 Ltd, unless clarified.	
Arboriculture	The principal disagreement relates to the adequacy and consistency of woodland and hedgerow buffers. Whilst the Applicant has introduced 50m buffers at certain locations, the Council maintains that a 50m buffer should be provided to all ancient woodland in accordance with VALP Policy NE8 and that hedgerow offsets should be measured from the outer edge of the retained feature, rather than a centreline or parcel boundary. The Council also remains concerned that works including fencing, drainage infrastructure, access arrangements and cabling could still encroach into root protection areas, woodland edge	Provide a consistent 50m buffer to ancient woodland measured from the edge of the woodland habitat and ensure all hedgerow buffers are measured from the outer extent of the retained feature. Secure final AMS, TPP, oCEMP and oLEMP provisions that clearly demonstrate how fencing, drainage, cabling, access routes and other infrastructure will avoid or appropriately protect retained trees, woodland edges and RPAs. Demonstrate that the Decoypond Wood interface retains an effective woodland buffer free from operational and construction	High

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	environments and retained arboricultural features unless robust controls are secured through the final AMS, TPP and LEMP. A further remaining issue relates to the interaction between the Scheme and former HS2 woodland mitigation land adjoining Decoypond Wood. Whilst HS2 has indicated that replacement mitigation has been identified elsewhere, the Council is not satisfied that the equivalent woodland buffering function at Decoypond Wood has been maintained and remains concerned that infrastructure and construction activity could compromise this area. Whilst progress has been made regarding replacement planting provisions, the Council remains of the view that the detailed LEMP should provide a clear and enforceable mechanism for replacement planting where protected trees are removed or subsequently fail following authorised works.	infrastructure and that any existing planting is retained and protected. Secure a clear replacement tree planting mechanism within the detailed oLEMP, including species selection, establishment, maintenance and long-term monitoring requirements.	

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Landscape and visual	Significant adverse effects on landscape character across the Claydon Bowl, Hogshaw Claylands, Twyford Vale and areas within the Aylesbury Vale Area of Attractive Landscape. Undulating landform and elevated settlements (particularly Botolph Claydon) increase visibility of solar arrays and the BESS, resulting in an industrialising effect inconsistent with the rural character of the Vale. Severe visual harm to users of nearby PRowS, especially the Bernwood Jubilee Way, where views toward and from ridge-top sections would become dominated by solar arrays and BESS structures. BESS location in fields D8/D9 is highly visually exposed, introduces large-scale engineered massing and noise fencing, and conflicts with settlement setting and key panoramic views. Mitigation proposed by the Applicant (hedgerows, fencing, localised planting) is insufficient and in some cases worsens impacts by enclosing formerly open rural views or introducing incongruous fencing. Cumulative landscape effects with HS2,	Remove or relocate solar arrays from the most visually sensitive and elevated parcels, particularly within Parcels 1 and 2 and fields D28–D29. Consider alternatives to the provision of BESS as part of the Scheme, or take steps to modify the BESS proposed and its location so that it is less visually elevated and that the harms caused by it are better contained. Introduce stronger, landscape-led mitigation using landform-responsive woodland belts and structural planting rather than reliance on hedgerow infill. Increase setbacks from PRowS and reduce enclosure effects by avoiding over-planting that alters currently open rural character. Provide a revised cumulative LVIA reflecting full combined impacts with HS2, EWR, National Grid works, and other local solar/BESS schemes. Revisit LVIA significance judgements using a precautionary approach that reflects low landscape capacity and high sensitivity of PRow users. This would be in the form of a five point assessment scoring approach rather than the three point which is currently utilised.	Low (both parties have discussed the points of disagreement and despite constructive dialogue an agreement has not been able to be reached).

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	EWR, existing/consented BESS, and other solar developments are under-assessed and materially understate combined impacts on rural character and tranquillity.		
Cultural Heritage	Under-assessment of the contribution of some elements of setting to significance, particularly in relation to Claydon House, its parkland, and its historic outlying estate farms and in relation to Botolph Claydon Conservation area and East Claydon Village and Botolph House. Insufficient consideration of important designed, associative and spatial relationships and their related views in the assessment, such as intended views of the two churches, which are acknowledged but downplayed in the assessment. Homogenisation of the historic agricultural setting of heritage assets, replacing historic field character with linear engineered infrastructure. Cumulative intensification arising from other major infrastructure (HS2, EWR, other solar/BESS schemes), which amplifies the extent of harm to an already pressured historic environment.	Re-siting of the BESS further from Botolph Claydon and sensitive ridge-top views. Removal or relocation of solar arrays from the former estate landscapes south of Orchard Way and from fields forming important components of the Claydon House setting. And removal of features to the east of Botolph Claydon. Improved, locally appropriate planting proposals, avoiding enclosure that erodes historic openness or intervisibility or screens key views from heritage assets, but adding screening where it can improve views of heritage assets (e.g. on the eastern side of Parcel 3 features to screen views towards Botolph Claydon Conservation Area from the east). Further screening has been found to impact other topics' receptors and it has been found that mitigation in this regard is not possible. Acknowledging the coherence and time-depth of the estate landscape and the level of	Low (the parties disagree on contribution of setting to significance for various assets and impacts and harm) Low (the parties disagree)

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	Understated impacts on Botolph Claydon Conservation Area, East Claydon Village including erosion of the historic character of approaches, the loss of agricultural character fundamental to their significance and the legibility and character of their wider relationships.	survival and contribution of the historic setting of Botolph Claydon Conservation Area and East Claydon.	
Population and Human Health	Population Tourism assessment is based on sensitivity judgements that draw from cultural heritage, PROW and landscape and visual assessments. As discussed at ISH1, the Council has reservations regarding the sensitivity and value assigned within those contributing topics; with this uncertainty then permeating into the population assessment for this receptor type. The tourism aspect of the Population assessment has not been incorporated within Appendix 14.2 [REP5-044]. This means that there continues to be a lack of transparency in the assessment and application of professional judgement that have led to the conclusions re: Population effects on tourism.	Population The Council would welcome a further review of the way in which the Population assessment integrates the contributing topic assessment findings for the tourism aspect of the Population assessment. This should happen once consensus is reached that the contributing topic assessments can be relied upon. The Council wishes to see the level of transparency of reporting that is provided in Appendix 14-2 [REP5-044] for all aspects of the Population assessment, not just the agricultural and non-agricultural businesses.	Medium

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	Human Health Whilst cumulative and in-combination effects are now discussed, the assessment continues to be structured principally around individual environmental topics and health determinants, rather than providing a clear place-based understanding of how multiple effects combine and are experienced by specific communities. The place-based narrative previously sought by Buckinghamshire Council has therefore not been fully provided. The assessment does not clearly bring together, for individual communities, settlements and receptor groups, the combined experience of landscape and visual change, traffic, noise, air quality, access changes and other environmental effects across the construction, operational and decommissioning phases. Nor does it clearly explain how professional judgement has been applied in drawing together these multiple effects, including differential effects on vulnerable and sensitive groups, to arrive at overall conclusions regarding significance at a community level. Whilst mitigation measures are identified throughout the assessment, it remains unclear how mitigation has been considered in relation to the overall combined experience of	Human Health The Council would welcome further consideration of how the Health and Wellbeing assessment brings together the findings of the contributing environmental topic assessments, cumulative effects assessment and in-combination effects assessment, with particular regard to explaining how multiple effects may be experienced by the named communities affected by the Proposed Development. The Council considers that a clearer place-based narrative would assist in demonstrating how differential effects on vulnerable and sensitive groups have informed the conclusions reached, how mitigation responds to the overall combined experience of effects at a community level, and provide greater transparency regarding the professional judgement applied in concluding that significant residual health and wellbeing effects would not arise at a community level.	Medium

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	effects for affected communities, rather than in relation to individual topic assessments in isolation. The Council considers that this limits its ability to understand, scrutinise and communicate, in a simple and transparent manner, how the combination of impacts arising from the Proposed Development may affect the communities that the Council represents. Whilst individual effects are assessed, the Council remains unable to readily understand from the assessment how those effects combine to influence the overall experience of particular communities over time, and how the proposed mitigation responds to that combined experience. Consequently, the Council retains a reservation as to whether the evidence currently presented provides a sufficiently clear and compelling basis for the Applicant's conclusion that no significant residual health and wellbeing effects would arise at a community level.		

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Socio-economics	The Council maintains that uncertainty remains regarding the extent to which the assessment captures the effects of the Scheme on existing rural businesses, tourism assets and the local economy. The Council remains concerned that the assessment relies heavily on the conclusion that landscape, visual and heritage effects would be limited. As set out elsewhere in the Council's case, the Council disagrees with those conclusions and considers that adverse effects on landscape character, heritage significance and the visitor experience may have consequential effects on tourism, recreation and businesses which depend upon the area's environmental and cultural assets. The Council also remains concerned that the cumulative impact of major infrastructure projects across the area has not been adequately reflected in assessing effects on local communities and businesses. Whilst the Scheme would deliver some economic benefits through investment and construction activity, the Council considers that the potential adverse effects on established businesses and the wider rural economy remain insufficiently understood.	Further consideration should be given to the relationship between the Scheme's socio-economic conclusions and the disputed landscape, heritage and cumulative effects evidence. Appropriate monitoring and engagement with affected businesses should be secured through the operational life of the Scheme where significant impacts are identified.	Medium

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Noise	Notwithstanding the Council accepts that the BS 4142 methodology is applied, and that the Applicant is below its own SOAEL and LOAEL figures with mitigation, the Council remain concerned the setting of the LOAEL at 40 dB(A) in the daytime and 35dB(A) in the nighttime specifically in the tranquil areas demonstrated in the Baseline Noise Survey. The Council has concerns that the wrong balance is struck between absolute and relative noise increases for tranquil areas.	A reconsideration of the approach to background noise and the figures for SOAEL and LOAEL set to account for those particularly tranquil locations and to strike the right balance between absolute and relative noise increases. This would provide for a more appropriate assessment in those locations which are particularly tranquil.	Low
Soils	Assessment does not correctly assess the impact on BMV land (in respect of Grade 2 land). The Applicant continues to consider the relatively small proportion of Grade 2 BMV land under consideration vs non-BMV land by summerly discounting effects on BMV land. Effects on BMV land must be properly assessed on their own terms, and doing this would change the current EIA assessment.	The applicant reassessed the impacts on BMV land in line with industry standards.	Low
	The Applicant has relied on inconsistencies in industry guidance that has allowed soils on site to be assessed as being at a lower risk of damage from compaction than would otherwise be concluded based on a precautionary approach.	The applicant reassesses the potential risk the soils on site face in relation to soil compaction using a precautionary principle. However, it is recognised that the oSMP provides control for the effects.	Low

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Cumulative Effects	Assessment underestimates cumulative impacts from major local infrastructure including HS2, East West Rail, National Grid works and nearby solar/BESS schemes. Limited analysis of how combined effects on landscape character, PRowS, tranquillity and visual amenity compound harm for local communities. Does not adequately consider combined ecological impacts on the Bernwood landscape, particularly for bats and hedgerow networks.	Assess cumulative effects fully given the size and scope of the Proposed Development, assess proportionately: • landscape and visual receptors • PRow amenity • human health and wellbeing • bats, hedgerows and woodland connectivity Commit to additional mitigation where cumulative impacts remain significant, including layout refinement, strengthened planting, PRow enhancements and noise controls.	Low