



AtkinsRéalis



Rosefield Solar Farm (EN010158)

Buckinghamshire Council's Comments on the Applicant's Updated Deadline 5 Documents

Buckinghamshire Council

August 2026

Buckinghamshire Council Comments on Applicant's Updated Documents at Deadline 5

Ref	Document	Buckinghamshire Council Comments
REP5-007	3.1.8 Draft Development Consent Order (Tracked) (Revision 8)	Of those suggested changes the Council commented upon in the ExA's Schedule of Changes, the Applicant has not implemented the suggested change to Article 12(4). Its reasons are provided in [REP5-098]. The Council recognises that the steps that can be taken under Article 12(4)(a) concern identified PRowS in Schedule 6 of the DCO and that, as a result, these have been assessed. In respect of any other PRowS, these have not been assessed but are subject to the Article 12(4)(b) rider that the street authority has a power of consent and may apply reasonable conditions to that consent. As such, any unassessed steps taken in respect of such PRowS are controlled by the street authority. The Council would, of course, prefer the Applicant to avoid using the power in Article 12(4) wherever possible. However, recognising the controls above, it is accepted that the controls are not necessary (even if the change is desirable). At Schedule 2, Requirement 20 the Applicant has now included provisions for the securing of the biodiversity management plan. As currently drafted, approval of documents under that requirement rests with the Secretary of State rather than the Council (and the Applicant has made consequential changes throughout the DCO to give effect to this e.g. in Schedule 16).

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		This requirement, as with others in Schedule 2, concerns land and effects of the Scheme on local businesses. Such biosecurity issues are likely to arise in the construction and operation period, and relevant is likely to be local knowledge and continued consultation with Preston Farms Ltd and TCS Biosciences. It is considered that the Council is best placed as a result to conduct approval of this requirement. As the Council explained at ISH3 (at para 75 of [REP5-103]) the Council considers it should still be the authority that approves this Plan, with relevant expert input (to be negotiated financially with the Applicant). That is so given oversight and enforcement will also fall to the Council. This also has the benefit of consistency with the other requirements and provides for a unified approach across all Plans for approval. The Council has concerns that the current approach risks the Biosecurity Management Plan being an outlier as a result of the comparative difficulty of the Secretary of State obtaining the relevant local knowledge.
REP5-028	6.2.4 Environmental Statement Volume 2 Chapter 9 - Cultural Heritage (Clean) (Revision 4)	No additional comment. The Council has commented extensively on the harm to St Mary's Church (the addition of which to the summary table being the only change since Deadline 4)
REP5-040	6.2.6 Environmental Statement Volume 2 Chapter 7 - Biodiversity (Clean) (Revision 5)	Upon review of the current documents, the Council is now satisfied with the information provided regarding BNG.

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REP5-044	6.4 Environmental Statement Volume 4 Appendix 14.2 - Effects on Individual Agricultural and Non-Agricultural Business Receptors	Buckinghamshire Council welcomes the production of Appendix 14.2 in response to Action Point 24. The appendix provides a clearer receptor-by-receptor assessment of affected agricultural and non-agricultural businesses, including consideration of sensitivity, mitigation and compensation measures, magnitude of change and residual significance. As a specific example, the additional information relating to agricultural landholdings and TCS Biosciences provides a more transparent explanation of the professional judgement and mitigation assumptions underpinning the Applicant's conclusions regarding business viability and residual effects (although, for the avoidance of doubt, concerns remain in respect of the effects on TCS Biosciences as is seen in the dispute between that Interested Party and the Applicant, and the policy position in respect of both upon which the Council has commented). The Council considers that this additional information has substantially improved the transparency and traceability of this aspect of the Population assessment. It has therefore addressed the Council's concerns regarding the transparency of the assessment, including professional judgement applied, in respect of individual agricultural and non-agricultural business receptors within the Population assessment.
REP5-046	6.4.2 Environmental Statement Volume 4 Appendix 5.4 - Glint and Glare (Tracked) (Revision 2)	This document is addressed in more detail in the Council's response to the ExA's Rule 17 letter.
REP5-048	6.4.2 Non-Technical Summary (Clean) (Revision 2)	The updates made to the Non-Technical Summary at Deadline 5, including the inclusion of a dedicated Health and Wellbeing section

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		provides a significantly clearer summary of health determinants, vulnerable populations, mental health and wellbeing, cumulative and in-combination effects, mitigation measures and residual health and wellbeing conclusions. The Council considers that these changes have substantially improved the accessibility and transparency of health reporting within the NTS. The changes have addressed previous concerns regarding the presentation of health and wellbeing effects to non-technical audiences, including through the identification of health and wellbeing effects relating to landscape and visual amenity that are assessed as significant for certain receptors and sensitive sub-populations.
REP5-057	6.4.4 Environmental Statement Volume 4 Appendix 7.17 - Biodiversity Net Gain Assessment (Clean) (Revision 4)	The Council welcomes the updated document and considers the methodology is now suitable.
REP5-065	6.4.7 Environmental Statement Volume 4 Appendix 5.5 - Health and Wellbeing Summary Statement (Clean) (Revision 7)	The revised assessment provides substantially greater consideration of health determinants and pathways, vulnerable and sensitive populations, mental health and wellbeing, cumulative and in-combination effects, and how findings from across the Environmental Statement have been considered through a health and wellbeing lens. The Council considers that these changes have significantly improved the transparency and accessibility of the assessment and have addressed a substantial proportion of the concerns previously raised. The Council also acknowledges that the revised assessment provides a clearer explanation of how environmental changes may influence

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		health and wellbeing outcomes and has improved reporting of differential effects on more sensitive population groups. The additional discussion of cumulative and in-combination effects provides a stronger and more coherent health narrative than was previously available. Buckinghamshire Council considers that the Applicant should provide fuller explanation of how multiple environmental changes could be experienced collectively by named communities and community receptors over the lifetime of the Proposed Development, and how mitigation responds specifically to that combined experience. It is acknowledged that the assessment identifies locations and receptors experiencing multiple effects and discusses these through a health and wellbeing lens. However, the reporting would benefit from community-focused interpretation to support an understanding of how the various topic findings come together at a local level and how this has informed the Applicant's overall conclusions regarding the health outcomes and significance of effects for named communities. Overall, Buckinghamshire Council considers that the revised Health and Wellbeing Summary Statement has addressed a substantial proportion of the concerns previously raised and has moved significantly towards the position sought by the Council. The Council is broadly satisfied that the latest revisions better demonstrate the consideration of health pathways, vulnerable populations, mental wellbeing, cumulative effects and health determinants. The deficiency, from the perspective of the Council, is insufficient interpretation of the assessment findings at the community level, connected to named

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		communities that will experience multiple impacts concurrently, leading to differential health effects from the wider population.
REP5-075	7.6.6 Outline Landscape and Ecological Management Plan (Clean) (Revision 6)	The Council welcomes the updates and the changes to the retained grassland for foraging bats as well as the commitment to create Lowland Meadow. The Council remains concerned regarding the lack of commitment to using cattle grazing but also how that would interact with the use of this for ground nesting birds. There is also concern about the lack of detail with the bat monitoring scheme. Further details are provided within our answers to the ExA request for further information and Summary Statement on Ecology. The reduction of Solar PV development in B6-B8 and the new buffers at B7 and B10 are welcomed. As explained elsewhere, however, from an ecology perspective the Council is not satisfied these changes are sufficient. From an arboricultural perspective, the reference to panel removal in B10 should be clarified and the 50m offsets reflected consistently in the main text and plans. The Council's outstanding comments on phased early planting, TPO replacements, arboricultural input reviews and long-term monitoring remain outstanding.
REP5-087	8.29.2 Construction Access Review (Clean) (Revision 2)	This document is addressed in more detail in the Council's response to the ExA's Rule 17 letter.
REP5-089	8.32 Applicant's Response to Deadline 4 Submissions	Appendix 1 in this document provides the Council's response to the Applicant's Detailed Cultural Heritage response.

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REP5-090	8.33 Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3)	It should be noted that the Applicant's response to Action Point 2 does not deal with the specific issue which was between the parties. All parties accept that there is policy supportive of BESS in the NPSs. However, as the Council recently stressed in its post-ISH3 submissions [REP5-103] at para 10 onwards, the point of dispute was about whether the need for BESS was set at the NPS policy level. For the reasons expressed by the Council there, it is not. In respect of Action Point 41, the Council maintains its position explained elsewhere. It must be remembered that the noise to be introduced is a constant incongruous electrical sound. Given the tranquility of some locations and the extent of the uplift compared to baseline (in some cases in excess of 10 dB) the Applicant's characterisation of this issue is not accepted. See also new text in the draft SoCG [REP5-024] at Ref 9-2 which reflects the position reached by the parties. In respect of the WHO Guidelines provided in this document, the Council draws particular attention to the summary limits at xvi for "Outdoors in parkland and conservation areas", and p.45 (among other sections).
REP5-093	8.36 Position Paper on Ground Nesting Birds and Wintering Bird	The Council welcomes this update but is still concerned that compensation measures for the identified species rely on proposed enhanced grassland that will be secured under the LEMP. This is a matter which will require to be addressed in detail in the detailed LEMP if development consent is granted.
REP5-094	8.37 Position Paper on Arable Field Margins and BNG	The Council welcomes the inclusion of all margins within the biodiversity metric calculations; we consider this approach complies

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		with guidance.
REP5-095	8.38 Applicant's Response to the Examining Authority's Schedule of Changes to the draft DCO	This has been commented upon as part of commenting on the draft DCO above.
REP5-097	8.40 Applicant's Response to Action Point 18 from ISH3	This document is addressed in more detail in the Council's response to the ExA's Rule 17 letter.
REP5-098	8.41 Applicants Response to Action Point 22 and 23 from ISH3	This document is addressed in more detail in the Council's response to the ExA's Rule 17 letter.

Appendix 1:
Buckinghamshire
Council's response to the
Applicant's Detailed
Cultural Heritage
Appendix contained in
REP5-089

In paragraph 1.3.1 the Applicant identifies a difference in approach to cumulative impacts as part-explaining the Council's different conclusions.

The Council would point out that the Cumulative Assessment [REP5-038] does not include Rosehill Farmhouse and outbuildings (grade II listed) and does not assess Botolph House (II* listed) separately from the medium significance conservation area in which it sits, and that where there is stage 2 cumulative assessment of heritage assets the applicant concludes no elevated effects on heritage significance, which suggests that a difference in approach may not explain the difference in conclusions between the Council and the Applicant.

In Table 17.12 of [REP5-038] HS2 and East West Rail are deemed not to have significant additional impacts on the heritage assets. The Council conclude that these projects place infrastructure across the wider settings of several heritage assets, most notably Rosehill Farm, to which the solar farm adds.

The Council's view is that the addition of the solar farm to the existing infrastructure and cumulative projects will alter the agricultural settings of a number of heritage assets profoundly, with the vast majority of the harm arising from the proposed solar farm.

While the cumulative projects have introduced and are introducing a significant presence of infrastructure into previously largely original agricultural settings, the proposed solar farm features would considerably increase this, tipping the balance to the point where infrastructure becomes a dominant element in the historic settings of the heritage assets. In the cases of the eastern Heritage assets in and around Botolph Claydon and East Claydon, the vast majority of the harm would result from the proposed solar farm. In most cases the solar farm alone would be sufficient to cause the level of harm identified by the Council. A notable exception is to Rosehill Farmhouse and outbuildings, where other infrastructure projects impact on its approaches significantly.

The Applicant comments in paragraph 1.3.2 that original settings of heritage assets have altered overtime, that they acknowledge that an appreciation of the historic or original setting of heritage assets informs an understanding of the asset, but that the Applicant considers that it is the current baseline setting against which the Proposed Development should be considered. This comment implies that where only part of the original or historic setting survives it might make less of a contribution to significance than more extensive elements of setting that do not contribute, or contribute less to significance. The Council agrees that the assessment should be against the current baseline. However, it is the contribution of the setting to significance that matters and is recognised in EN1 (para 5.9.10) as being the main consideration. Surviving historic, particularly surviving original elements of setting, and especially elements of setting that were deliberately intended by the original designers of the buildings make the most/strongest contribution to significance and where these are adversely impacted the harm is likely to be greatest. Similarly, where these elements of historic setting are enhanced the significance is better revealed. Thus 5.9.36 of EN1 states that "the Secretary of State should give appropriate weight to the desirability of preserving the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset."

In the case of Botolph House, for instance, where part of its original setting survives, displays its original design intent and significance and remains legible, this contributes

considerably to the building's significance. If, as proposed, a band of development is built across this surviving crucial contributory setting element rendering it less legible and eroding its historic agricultural quality considerably there would be a significant impact to the heritage asset's significance.

In relation to paragraph 1.4 of [REP5-089] The Council agrees that impacts that are moderate, minor or negligible equate to range of less than substantial harm. The Council refutes the logic that this means that it must have overstated the level of harm. Within these bands although the Council identify moderate towards the high end of less than substantial harm it can also be identified at the upper middle of the scale of less than substantial harm, similarly negligible and minor are broad bands.

In relation to individual assets discussed by the Applicant in section 5 of [REP5-089] the council has the following comments:

Claydon House:

The original entrance route to Claydon House was from the southern gate, making the approaches from the south west historic . The more northern parts of the house, discussed by the Applicant, appear to have been partly built but the full conception was never finished and the house has been adapted to face south west, with the ha-ha and lawn emphasising this orientation. The south west frontage and its relationships are therefore significant.

The Applicant mentions that the building derives much of its significance from its fabric. This is the case with nearly all heritage assets, and does not mean that the setting (which is mostly unchanged since the 18th century, except where the former parkland has been detached) does not make a major contribution to its significance. The context of historic buildings and sites forms an important part of their significance. There have been numerous cases where setting impacts to buildings with highly significant fabric and architecture are seen as causing substantial harm, where the physical building remains untouched. The Council therefore maintains its assessment of harm in respect to the setting of Claydon House and other listed buildings and heritage Claydon House assets.

The Applicant argues in paragraph 1.5.5 of [REP5-089], that where there is a minor adverse impact the significance is slightly compromised and this would equate to a low level of less than substantial harm. The Council identifies the impact to both Claydon House and the park to be greater than identified by the Applicant at the higher end of minor adverse. Given the high significance of Claydon House the Council concludes a moderate adverse effect and that equates to less than substantial harm at the middle of the scale. As the Applicant has identified in their methodology that the full gamut of less than substantial harm is covered by negligible, minor and moderate impacts it is reasonable to identify an impact at the high end of minor to be in the middle of the scale of less than substantial harm. Also, given the high significance of Claydon House and using the Applicant's matrix set out in Table 9.7 of Chapter 9 of the ES, REP5-028, p.77 , a minor adverse impact can have a moderate adverse effect, which represents a significant impact, rather than a minor impact being seen as necessarily meaning that the significance is slightly compromised. The assessment is also subject to professional judgement and the council's expert's professional judgement is that the harm is in the middle of the scale less than substantial harm.

The Fernery, and Arch and wall to stables

The Council has no further comments relating to these two listed buildings, other than mentioning that there is a historic relationship with these buildings as the historic access point to Claydon House and the wider approaches to the House and church which would be affected by the proposed development.

All Saints Church

The Council consider that the presence of extensive PV arrays south of Calvert Road/Orchard Way would be noticeable to people moving along the roads. There would be gaps in screening and local people moving around the area on the approaches to All Saints church would be aware of the PV arrays. Also, the views from Knowl Hill and on path approaches from the south would include arrays. Contrary to the Applicant's comment in paragraph 1.5.11 of [REP5-089] that the associations and prominence of the church would not be diminished, the Council considers that the church tower's prominence within the landscape would be diminished by PV arrays in views from the Knowl Hill, where the church would vie with the block of PV arrays to the left of the view.

Botolph Claydon Conservation Area

In response to the Applicant's comment in paragraph 1.5.13 of [REP5-089] that the Council base its assessment on the percentage of the setting which would change rather than how this change would affect the heritage significance of the conservation area, this is not the case. The Council's assessment is based on the contribution of the setting to the significance of the conservation area. The ridgetop position of the conservation area and its location dominating the valley to the east, south east and south and the dramatic views this provides from the opposing hills and historic villages in these directions and from the valley floor, as well as the views on the southern footpath approaches make a major contribution to its significance and form a major part of its setting. This will be harmed by the Parcel 2 and 3 solar farm features. The Council's comments on the percentage of the contributory elements of the setting affected specifically addresses one of the considerations, set out in Paragraph 5.9.34 of EN1, which states that:

"...Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.32, as appropriate, considering the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."

The Council's comments demonstrate that a large amount of the contributory setting will be affected by the Parcel 2 and 3 features and this will therefore cause considerable harm to Botolph Claydon Conservation Area as a whole.

We maintain that the harm will be in the middle of the scale of less than substantial harm.

Botolph House

In relation to the Applicant's point in paragraph 1.5.16 of [REP5-089], as with our comment above in the third paragraph of our response on Claydon House and Park, and using the reasoning we put forward in that paragraph, the Council's expert's professional judgement is that the harm is in the middle of the scale less than substantial harm.

East Claydon Village

The Council acknowledges the error identified by the Applicant in paragraph 1.5.18 of [REP5-089]. In relation to the Applicant's comment on the village's character, it is identified that an important element of the village's character and appearance is that it appears very prominently in long views from the east, south east and south. In response to the applicant's comment in paragraph 1.5.21, the Council has considered how the views contribute to the significance of the village and have set this out in detail in various responses. The Council have demonstrated that the setting to the east, south east and south contribute greatly to the village's significance. The comments on the proportion of the contributory setting affected relate to the need to consider its role in contributing to the village's significance as a whole, in relation to other elements of setting, which the Council concludes forms a major part of the contributory setting, and the need to address paragraph 5.9.34 of EN1.

The distance of 980m between the Proposed Rosefield Substation and the village mentioned by the Applicant in paragraph 1.5.22 of [REP5-089] means that it will remain in the foreground and middle ground of the long views of the village from the east, south east and south and will form a band of development with the other features in Parcels 2 and 3 in views out of the edge of the village

St Mary's Church

In response to the Applicant's points raised in paragraphs 1.5.26 and 1.5.27, the Council maintains that the setting to the east and south east is largely unchanged for several centuries. Enclosure in this area would have been in full swing by the 18th century and the landscape of Aylesbury Vale would have had an agricultural character before, during and after this process. The fact that the nearest fields would remain agricultural does not change our assessment that the long views towards the church from the east, south east and south make a significant contribution to the church's significance and would include the substation, main collector compound and other features of the solar farm in the fore and middle ground. The Council's professional judgement is that there would be less than substantial harm in the middle of the scale to the grade II* St Mary's Church.

Rosehill Farmhouse and outbuildings

The Council has no further comments on Rosehill Farm, other than to disagree that we have overstated the harm. And maintain that the solar farm development and screening to the south of Calvert Road will further isolate the farm in its former setting and be a presence in the approaches from the south east and south west. With only the setting relationships to the east not being affected by the presence of modern infrastructure.

Blackmoorhill Farmhouse

The Council has no further comments other than those already provided.

Pond Farmhouse

In relation to the Applicant's comment ([REP5-089], paragraph 1.5.39) that the listed building derives the majority of its significance, and its principal reason for designation, from the inherent historic and architectural interest of its fabric, the Council refers to its argument on this point provided above in relation to Claydon House (see second paragraph

of our response I the Claydon House and Park section above). The Council's expert's professional judgement is that the severing of Pond farmhouse's setting relationships, effectively removing it from its wider context would, under a conservative assessment, constitute less than substantial harm at the upper end of the scale. The Farmhouse's setting includes its farm and the way it sits within its farmland and its wider legible associations forms a major part of its historic and current context.

Bernwood Farmhouse

The Council has no further comment.