



AtkinsRéalis



Rosefield Solar Farm (EN010158)

**Rule 17 Examining Authority's Request for Information –
Buckinghamshire Council Response**

Buckinghamshire Council

August 2026

Request for further information by the Examining Authority

Introduction

1. Buckinghamshire Council has provided a response, where relevant, to the Examining Authority's request for further information pursuant to Rule 17, dated 3 August 2026.

A response is provided in relation to the following matters:

- Alternative access route
- Glint and glare effects
- Updated National infrastructure planning guidance
- Ecology and biodiversity

Alternative Access Route

2. The Council has considered the Construction Access Review at [REP4-087] and the report produced by Preston Farms Ltd and TCS Biosciences Ltd at [REP5-111]. The Transport Assessment for the Scheme remains that provided in the Environmental Statement and most recently updated at [REP4-047].
3. In respect of the routes proposed in the Transport Assessment, it is correct (as is recorded at para 2.12.2 of [REP4-087]) that the Council have agreed the access strategy in principle. That is as a result of reviewing the Environmental Statement and particularly the Transport Assessment, and from engagement with the Applicant.
4. The Council recognises that there may be some dispute as to the sensitivity of the routes (see e.g. Table 1 of [REP5-111]), and overall as to the effects comparing the proposed access strategy in the Transport Assessment and that proposed by Preston Farms and TCS Biosciences (see e.g. Table 4.1 of [REP4-08] and para 7.1 of [REP5-111]). However, the Council has not seen an alternative Transport Assessment and is only able to assess what was provided to it.
5. For that reason, the Council remains of the view that the proposed access strategy is acceptable having considered what is in the Transport Assessment. The Council cannot come to a view on whether the alternative route proposed by Preston Farms Ltd and TCS Biosciences would be acceptable one way or another absent a Transport Assessment.
6. However, the Council does recognise that in agreeing the proposed access strategy in principle, it has not considered the specific concerns and sensitivities of Preston Farms Ltd and TCS Biosciences. As Table 1 of [REP5-111] indicates, the original Transport Assessment did not consider this, the Council did not consider this specific issue in

reviewing the Transport Assessment, and (ultimately) the matter turns on a detailed understanding of those businesses and the effects of the Scheme.

7. Thus, the Council's agreement to the proposed access strategy must be seen with that caveat. The ExA's conclusions on the effect of the Scheme and the proposed access strategy on Preston Farms Ltd and TCS Biosciences may provide a reason properly to conclude that an alternative access route would be appropriate; as the Council has not come to conclusions on this point (as it has not seen a full Transport Assessment and associated assessment related to Preston Farms Ltd and TCS Biosciences), it cannot say one way or another. For that reason, the Council's position in the SoCG remains the same, albeit this caveat should be noted.

Glint and Glare

8. Glint and glare was a topic addressed at ISH3 (see [REP5-103] from para 64). As is summarised there, the principal concern of the Council was whether the Applicant has assessed the sensitivity of local roads as too low (at low). In response the Applicant has produced a technical note in response to Action Point 22 and 23 (being [REP5-098] and also an updated Environmental Statement chapter at [REP5-046]). The Applicant also submitted a copy of the Pager Power guidance at [REP5-046]. This is welcome.
9. For the avoidance of doubt, the Council does not have a glint and glare expert and, as a result, is unable to engage with the technical aspects of how glint and glare calculations are undertaken etc. However, the Council considers it can comment on the guidance provided (specifically from a traffic and transport perspective).
10. Considering the Pager Power guidance, it is apparent from para 7.10 that local roads are stated to be low impact no matter the nature of the reflection that is identified as geometrically possible. Para 7.12 goes on to state "Local roads may, under particular conditions, prove to be vital to the surrounding road network. Therefore, consultation with the local highway authority is recommended to ascertain the significance of a surrounding road where it is unknown". The definition (at internal page 13 of the Guidance) states "Typically roads and lanes with the lowest traffic densities. Speed limits vary".
11. The Applicant's original analysis of this issue is from para 6.3.1 of the glint and glare Environmental Statement chapter (in [REP5-046]). As is apparent, it has been assumed based on the Pager Power guidance that impacts on such roads are always low. Such a blanket assumption is, in the Council's view, concerning, and also does not address the import of the local roads to the functioning of the road network (to which, see the Guidance quoted above). As is apparent from section 8 of the Applicant's paper, reflections on some of these roads are possible.

12. As the Council has previously explained, the severity of a safety event caused by glint and glare is high (it could lead to a crash). As to susceptibility, it is not accepted that ostensibly low numbers of users on roads at national speed limit speeds (e.g. Hogshaw Road) results in a low susceptibility. The Council remain concerned that the Guidance has been applied in a blanket way which results in the omission of potentially significant glint and glare effects and/or the need for mitigation.
13. It is noted that the Guidance is not national policy; it is also unclear what independent input and review has been received by third party stakeholders (e.g. the CAA for aviation, local highways authorities and National Highways for roads). Certainly, the Council consider that this approach to local roads would be something which it would raise concerns about given the safety-critical issues that can still arise on local roads (particularly at national speed limit speeds). In any event, in this case in line with the Guidance at para 7.12, the Council has not had opportunity to specifically comment on the roads concerned.
14. In its response to AP22 and 23 from ISH3 the Applicant has produced a Technical Note which, functionally, operates as a sensitivity test on the local roads in the area. As can be seen from the Pager Power flow chart and para 1.2.49 and the outcome of the note at para 1.2.49, for a number of roads it is only their identification as “local roads” which leads to the low impact outcome. For School Hill, Orchard Way, Claydon Road, and Hogshaw Road not ending the assessment at that stage results in a conclusion of “moderate impact” and “mitigation recommended”.
15. Glint and glare effects on road users have the potential to be a safety hazard. In such circumstances it is considered a precautionary approach is appropriate. The Council thus suggest that, in respect of those roads for which a sensitivity test has resulted in a “mitigation recommended” outcome, such mitigation should be provided for as a possibility in the relevant outline plans (so that, if required, this issue can be explored in further detail at the discharge stage). That might be by way of amendments to the oLEMP and/or the oCEMP and/or the oOEMP to include in respect of those roads that:
- a. That new and existing hedgerows may be managed and maintained and allowed to increase in height to a maximum height of the solar panels in the adjacent field (typically 3.5AGL). This provision is used in the oOEMP for the made One Earth Solar DCO (EN010159, [REP6-025]).
 - b. That a fixed direction for specific areas of panels may be secured in detailed design. This is proposed in the currently being examined Lime Down Solar Park (EN010168, [REP4-050] and [REP4-052]).

- c. That smaller sized panels (e.g. 2.5m 1p fixed panels) for specific areas of panels may be secured in detailed design. This is proposed in the currently being examined Lime Down Solar Park (EN010168, [REP4-050] and [REP4-052]).
16. The Council consider the text of these three sub-paragraphs could be lifted and added to the oCEMP and oOEMP tables for these specific roads, with monitoring of the hedgerows provided for under the oLEMP (monitoring of size and direction of panels not requiring independent monitoring).

Updated National Infrastructure Planning Guidance

17. The Council has reviewed the National Infrastructure Planning Guidance that came into force on 24 July 2026, including the Planning Act 2008: Introduction to National Infrastructure Planning Guidance (July 2026). The Council does not consider that the guidance materially affects its position on the Proposed Development.

Ecology and Biodiversity

Bechstein's Bats – Potential for loss of foraging habitat

18. The Council has reviewed the updated in the Works Plans [REP5-004] and outline Landscape and Ecological Management Plan (oLEMP) [REP5-075] provided at Deadline 5. The Council has also considered Natural England's Response for Deadline 5 [REP5–106].
19. The Council considers that to avoid significant impact on Bechstein's bats resulting from loss of foraging, displacement or loss of landscape connectivity, that panels need to be removed from fields B6, B7, B8, B10, and D28 and D29.
20. The proposed removal of panels from B6 and B8 and partial removal of panels from B7 is a welcomed improvement and the Council note the overall area of grassland available to foraging bats within 1.5km of Shrubs Wood within a sheltered location will remain the same, once new habitats have established.
21. The Council remains concerned that by not removing panels entirely from B7 and not removing some panels from D28 and D29 there remains the potential for impacts to commuting routes and displacement of bats from these areas.
22. The Council remains concerned that there is no commitment to use cattle grazing to manage the retained grassland within B6, B7 and B8 as cattle grazed grassland was identified as an important resource for Bechstein's bats.

23. The Council remains concerned that the commitment to using cattle grazing on other fields is not strong enough to be assured that it will happen. The Council considers that the wording within the (oLEMP) [REP5-075] should be changed:

- a. Paragraph 5.2.4 'cattle may be used to graze the larger grassland areas...' should be changed to 'cattle will be used to graze the....'
- b. Paragraph 5.2.22 'The neutral grassland will be managed either through extensive grazing or a hay cut late in the summer after ground nesting birds have fledged.' changed to 'The neutral grassland will be managed through low density cattle grazing'.
- c. Paragraph 5.2.26 changed to 'The lowland meadow will be managed either through low density cattle grazing or a hay cut late in the summer followed by aftermath grazing with cattle, after ground nesting birds have fledged.'

Bechstein's Bats – Location of construction compound

24. The Council supports the recommendation from Natural England to locate the construction compound within parcel 1 away from boundary features where possible and would welcome wording to this effect being provided.

Bechstein's Bats - Bat monitoring strategy

25. The Council welcomes the updates to the outline bat monitoring strategy and notes that this is still being discussed with Natural England. The Council understand that the methodology for establishing a baseline and agreement with HS2 in relation to compositional analysis of different habitat types and areas and to identify flight lines are being discussed with Natural England.

26. The Council remains concerned that the bat monitoring strategy has not identified possible remedial actions for all objectives. In relation to the objective that the buffers are adequate, and connectivity have been maintained there are no potential remedial actions identified. The Council considers that the primary remedial action in the case that a clear and consistent decline in bat activity along buffered habitats is that the buffers need to be made larger. This should be explicitly stated within the monitoring strategy.

27. In relation to species rich grasslands not developing as indicated, the remedial action should include reseeding and amendments to the management, but also the provision of additional areas of species rich grassland where changes to the management regime continue to fail to achieve the outcomes.

Great Crested Newts

28. The documents submitted with the application have been reviewed along with ecological data held by Buckinghamshire Council and aerial imagery of the site. Ecological reports and surveys have concluded that great crested newts are likely present onsite, and the Proposed Development would therefore require a protected species licence.
29. Currently the Applicant wishes to keep their licensing options open (Buckinghamshire Council's District Licensing Scheme or Natural England European Protected Species Licence) and to be decided as a later date. Currently, Natural England have stated that insufficient information has been submitted to grant a letter of no impediment, therefore, it has not been demonstrated that a protected species licence from Natural England will likely be granted.
30. The Applicant has made initial enquires with NatureSpace regarding the District Licence, however, a full assessment was not able to be carried out as they were unable to provide a detailed impact plan to inform a proportional compensation fee. However, it is noted that the Applicant in its SoCG with Natural England [REP5-017] suggests that an offer in principle from NatureSpace, however NatureSpace to date has not agreed this. Clarity is needed and this matter should be resolved before a decision is made.
31. With the current level of information provided, the Applicant is unlikely to be able to demonstrate appropriate mitigation for great crested newts. The Applicant should therefore provide a more detailed mitigation strategy to satisfy Natural England and obtain a letter of no impediment. A requirement can then be used and licensing route confirmed prior to commencement.
32. Alternatively, the Applicant can approach NatureSpace for a reassessment to obtain evidence that the application can be covered under the council's District Licensing scheme.

Ground Nesting, Wintering Birds & Farmland Birds

Ground nesting birds

33. The Applicant has estimated the number of ground nesting Skylark across the site using recognised metric calculations assessing the existing habitats quality to harbour these species. Some recording was carried out to back up this approach. Despite using the lower thresholds within the metric to estimate the numbers of breeding Skylark this approach is broadly accepted by the Council.

34. The critical issue when accepting this principle was the amount of retained and enhanced habitat of suitable quality to sustain populations of Skylark at the assessed levels. 95Ha of enhanced grassland is proposed to be established. While this is considered to be sufficient to sustain the volumes of this species estimated (39 breeding pairs), concerns have been raised on the multi-functional requirements of this area of enhanced grassland. As set out within the Applicants' case this land is required for a number of species being impacted by the proposals including foraging and commuting bats and over wintering birds.
35. For those 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. These are partially set out within the outline Landscape and Ecological Management Plan (oLEMP). Further iterations of this plan will need to be secured if this application is approved. Management prescriptions for this area will differ depending on species requirements. What is lacking within the oLEMP are thresholds within the monitoring aspect to implement remedial measures to address consistent declines of identified species. Those measures will need to be explicitly set out to ensure the validity of monitoring now.

Over wintering birds

36. The Applicant has provided further technical papers on the impact the proposal has on recorded over wintering bird populations. Two species, Lapwing and Golden Plover, were recorded on site at volumes considered by the Applicant not to be significant at a local level. This assessment was based on the sites recorded numbers and comparing them to national figures from 2006-07 UK population estimates from the British Trust for Ornithology (BTO). However, further research on population dynamics of these species by the BTO between 1998-2023 indicates a 41% decrease in Lapwing numbers and 26% decline in Golden Plover. The national decline in these species has not been accounted for in the Applicants account of those species. When factoring in the national decline and comparing with current Buckinghamshire's population estimates for these species the numbers identified would constitute at least 1% of the local population so should be considered significant at this level.
37. As with ground nesting birds the Applicant is intending to compensate the loss of existing habitat within the 95Ha of enhanced grassland proposed as part of the Scheme. With appropriate management this area of land can be considered sufficient to address the displacement of those species. However, without meaningful management and monitoring it is unclear if permanent impacts will be incurred as a result of the proposal. The multi-functional requirements of this area for the various identified impacted species will require different management to accommodate the needs of those individual species. The oLEMP does not contain any specific measures

for these over wintering birds. That will need to be established now for this principle to be accepted. Monitoring will need to include remedial measures to address any consistent declines in identified species with a reactive mitigation and compensation commitment to address that scenario.

Farmland birds

38. The Applicant has stated the Scheme will have significant beneficial effects on farmland birds at a local level. While this statement is likely to be accurate for the majority of the species identified it is not considered to be the case for the three species discussed: Lapwing, Skylark and Golden Plover. The status of these species on site post development is entirely dependent on the quality of enhanced habitat proposed, the status of which cannot be predicted due to the complex needs of that area. Acknowledgement of this fact should be made along with a commitment for robust management prescriptions, monitoring and remedial measures established to address any consistent declining numbers of those species.

Biodiversity Net Gain

39. The Applicant has addressed the issues previously raised, including the time lag to create Lowland Meadow, mapping of field margins and identifying 'additional enhancement' from 'mitigation'. The BNG assessment is considered robust and indicates that the Scheme could deliver 40% net gain in habitat units, primarily from creating grassland on existing arable land. The BNG assessment will need to be kept up to date as the details of the scheme are finalised.
40. Whilst the BNG assessment is suitable for this stage in decision making, there are some risks in delivery. Lowland Meadow is technically difficult to create and requires low soil nutrients. The Applicant is aware of this and has committed to soil stripping as required following further assessments. Additionally, planting new trees within existing hedgerows is challenging and requires either existing gaps or places where removing vegetation would not be detrimental.
41. Biodiversity Net Gain is an approach to compensation for lost habitats. The mitigation hierarchy is to avoid impacts, and only where not possible to mitigate and then, only where not possible to compensate. It is also a simplistic way to quantify habitat value, which works well for most development schemes but arguably not as well for solar schemes. Solar schemes create large areas of grassland habitat, which the biodiversity metric assigns a biodiversity value to. However, the biodiversity metric does not account for the impact of the panels on the ability of the grassland to be used by some species of wildlife, or of any displacement of existing wildlife resulting from the presence of infrastructure.

42. The Council acknowledges that habitat enhancement can produce significant biodiversity gains on ecologically degraded sites. However, the proposed development is not located on land of low ecological value. It is proposed within a sensitive ecological landscape supporting important habitats and species assemblages. The Council's concern is therefore not with the principle of habitat enhancement, but that the biodiversity metric does not fully account for the ecological value and functionality that may be lost or altered when solar infrastructure is introduced into an already ecologically rich environment.
43. The Council continues to recommend that limited weight be given to the level of net gain calculated by the biodiversity metric for this scheme.